# SARA TITLE III SECTION 313 INSPECTION REPORT 95-313U-017

# I. Facility

Alloy Surfaces Co., Inc. 100 Locke Road Wilmington, DE 19809-3513

SIC 3479

#### II. Date of Inspection

February 9, 1995

## III. EPA Inspector

Malcolm Reynolds Technical Advisor Toxics Enforcement Section (3AT12) (215)597-3659

## IV. Company Officials

Donald Greenfield-Consultant (302)762-8900

#### V. Purpose of Inspection

Alloy Surfaces Co., Inc. is a manufacturer of electrometalugical products and has submitted a Form R under Section 313 of SARA Title III for the following reporting years: 1991, 1992, and 1993. This inspection was conducted to inspect, document, and verify the facility's compliance with the reporting requirements stated in 40 C.F.R. Part 372 under Section 313 of SARA Title III. Specifically, the purposes of this inspection are to investigate the quality of the toxic release inventory data reported by the facility and to verify the appropriate threshold determination calculations for chemicals which the facility has not submitted a toxic chemical release form for.

#### VI. Opening Conference

# 1. Inspection Procedures and General Information

On February 9, 1995, a Section 313 inspection was conducted at Alloy Surfaces Co., Inc. Approximately 5 days prior to the inspection a letter was sent to the company confirming the date of the inspection (attachment D). The EPA inspector met with company representatives at 10:30 a.m.

The inspector's credentials were presented and a Notice of Inspection was presented and explained. Mr. Greenfield signed the notice and an outline of the areas to be investigated was discussed.

## 2. Facility Description

Alloy Surfaces Co., Inc. is publically owned. Mr. Greenfield is responsible for environmental matters. The Wilmington, DE plant is the only plant and serves as the headquarters as well. The facility produces electrometalugical products. Special alloys are fused on to articles to give them special properties such as heat resistance.

#### VII. SARA Title III

Section 313 was the primary focus of the inspection. The facility was phoned prior to the inspection to determine if an inspection was warranted (attachment E). In addition, compliance with Sections 302,311, and 312 was checked. A copy of the letter sent to the facility confirming the date of inspection (attachment D) was sent to the Superfund Removal Branch to allow them the option to further investigate compliance with Sections 302, 311, and 312 at their discretion.

A plant, factory, or other facility comes under the provisions of Section 313:

- 1. If it conducts manufacturing operations (that is if its primary Standard Industrial Classification Code (SIC) is from 2000 through 3999;
- 2. If, in addition, it has 10 or more full-time employees; and
- 3. If it manufactures (including imports) or processes more than 75,000 pounds of a listed toxic chemical during any calendar year 1987 or manufactures (including imports) or processes more than 50,000 lbs. during calendar year 1988, or manufactures (including imports) or processes more than 25,000 lbs. during calendar year 1989 or later, or otherwise uses more than 10,000 pounds of a listed toxic chemical during any calendar year.

Mr. Greenfield stated that the plant's primary SIC Code is 3479 and the plant had 45,50, and 70 employees in the following calendar years: 1991, 1992, and 1993 respectively. The remainder of the inspection involved

determining if the plant manufactured, processed, or otherwise used any one of the listed toxic chemicals in excess of the thresholds in calendar years 1991, 1992, and 1993.

Mr. Greenfield stated that the facility does not manufacture any chemicals at their plant and no chemicals are imported into the facility.

For the inspection, they had compiled summaries of usages of Section 313 chemicals as shown in attachment #1. Copies of the toxic chemical release forms inspected are included as attachment 2. All documentation supporting the figures in the toxic chemical release forms are included as attachment 3. According to attachments 1 and 2, the usage of Section 313 chemicals and releases reported are summarized as follows, (all figures in lbs.).

Year	<u>Chemical</u>		<u>Usage</u>	Total Releases	Offsite Transfers
1992 1993	1,1,1-Trichloroet 1,1,1-Trichloroet		56,100 57,200	1200 2400	0 2730
	Recovered/ Recycled	Trea	ited	sold	
1992 1993	4580 1800	0 2730		54,900 52,070	

1,1,1-Trichloroethane is used for formulation component, and is (processed/otherwise-used.

Mistakes on 1993 Form R for 1,1,1-Trichloroethane Used 1992 Form R instead of the 1993 form.

## Section 3.1

- b. Import-Purchased from distributor who imported the chemical. This is not to be marked imported unless it is purchased directly from foreign company.
- C. and D. not to be marked unless chemical is produced or imported.
- 8.1 should have been 2400 lbs/year instead of 1200.

Mistakes on 1993 Form R for 1,1,1-Trichloroethane

#### Section 3.1

b. Import- Marked import but should not have been marked import.

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	Recovered/ Recycled	Trea		<u>sold</u>	
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- C. and D. not to be marked unless chemical is produced or imported.
- 8.1 should have been 2400 lbs/year instead of 1200.

#### Mistakes on 1992 Form R for 1.1.1-Trichloroethane

#### Section 3.1

b. Import- Marked import but should not have been marked import.

c. Marked erroneously.
6.2.1- Didn't mark NA
7A -Didn't mark NA

### VIII. Closing Conference

Appropriate documents were requested by the EPA Inspector and the SARA Title III Section 313 investigation was concluded. Receipt for Samples and Documents was filled out at the end of all inspection activities.

# IX. Attachments

- A. Notice of Inspection
- B. Receipt for Samples and Documents
- C. FTTS Summary
- D. Letter to Facility Confirming Date of Inspection
- E. Initial telephone call record.
- 1. Summary of Section 313 chemicals used
- 2. Toxic Chemical Release Forms
- 3. Supporting Documentation for Figures in Toxic Chemical Release Forms.

# X. Summary of Findings

Alloy Surfaces Co., Inc. submitted Form Rs under Section 313 for the following reporting years: 1991, 1992, 1993. The records showed that the facility had greater than 10 employees (50) and is a manufacturer (SIC Code 3479).

The facility has submitted Form Rs for the following chemical (all figures in lbs.):

Year Chemical	<u>Usage</u>	Total Releases	Offsite Transfers
1992 1,1,1-Trichloroe	thane Formulation Component	1200	0
1993 1,1,1-Trichloroe		2400	2730
Recovered/Recycle	d Treated		
4580	0		
1800	2730		

IMPORTANT: Type or print; read instructions before compi	eting form) Form Approval Expires: 11/92	PAGE 1 OF 9
EPA FORM R	TOXIC CHEMICAL RELEASE	TRI FACILITY ID NUMBER
United States	INVENTORY REPORTING FORM	19809LLYSR100L0
Environmental Section 313 of the Emergency Plannin Protection also known as Title III of the Super Adency	g and Community Right-to-Know Act of 1986 fund Amendments and Reauthorization Act	Chem., Cat., or Gen. Man
		1,1,1-TRICHLOROETULVE
HERE TO SEND P.O. Box 3348 COMPLETED FORMS: Merrifield, VA 22116-3348 ATTM: TOXIC CHEMICAL RELEASE INVENT	2. APPROPRIATE STATE OFFICE (See instructions in Appendix F)	Enter "Y" here if this is a revision
IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked.		For EPA use only
PART I. PACILITY IDENTIFICATION INFORMATION	For 93	
Bassesia S. Manu Gucker Milowallon	When u	NOD 1
YEAR 2.1 Are you claiming the toxic chemic team. [ ] Tes (Answer question 2.2; Attach substantiation forms)	ar that	mitted
1993   2.2  If yes in 2.1, is this copy:	[] Sani Ma	calm
SECTION 3. CERTIFICATION (Important: Read and sign afte	***************************************	- 1
hearby certify that I have reviewed the attached docume aformation is true and complete and that the amounts and ata available to the preparers of this report.	0 0	128/94
nme and official title of owner/operator or senior manage STEPHEN BOWERS, PRESIDENT	ement officia	OK
gnature	Date Signed _23/Man/9/	7040451404847484868474888474884
CTION 4. FACILITY IDENTIFICATION	The state of the s	
Facility or Establishment Name ALLOY SURFACES COMPANY, INC.	TRI Facility ID Num 19809LLYSR100L0	cer
Street Address	440004000000000000000000000000000000000	
100 LCCKE ROAD	44000000000000000000000000000000000000	
City WILMINGTON	County NEW CASTLE	7
State DE	Zip Code 19809-3513	
Mailing Address (if different from street address)	1	
City	PUT LAE	el here
	1 1	1



# EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

SECT	ION 4. FACILI	TY IDENTIFICATION	(Continued)	1 7				
4.2	This report	contains information check only one)	ation for:	[X] An entire	facilit	y	b. [ ] Part of a	facility
4.3	Technical Contact	Name DONALD C GREENF	ELD		Telep	hone Number (in (302)7	clude area code) 62-8900	
4.4	Public Contact	Name L. STEPHEN BOWE	2.2		Telep	hone Number (in (302)7	clude area code) 62-8900	
4.5	SIC Code (4-digit)	a. 3479	b. 2899	c. 3489		d. NA	e.	f.
	Latitude		Latitude				Longitude	
4.6	and	Degrees	Minutes	Seco	nds	Degrees	Minutes	Seconds
	Longitude	039	44	36		075	30	12
4.7	Dun & Brads	treet Number(s)	9 digits)			a.	0023418	24
			7-15			b.	NA	
4.8	EPA Identif	ication Number(s)	(RCRA I.D. No.) (12 characters)			a.	DED9808	27919
						b.	NA	
4.9	Facility NP	DES Permit Number	(s) (9 characters	)		a.	NA	
	No.					b.		1 -
4.10	Underground Number(s)	Injection Well 0	ode (UIC) I.D. (12 digits)			a.	NA	
		4.				b.		
SECT	ION 5. PARENT	COMPANY INFORMAT	ION		İW			
5.1	lame of Paren	t Company			7		2 /	
	] NA		MATEC	CORP				
5.2 F	arent Company	y's Dun & Bradstr	eet Number		His			

EPA Form 9350-1 (Rev. 5/14/92) - Previous editions are obsolete.

002341824

(9 Digits)

[ ] NA

,,		A FOLY A		TRI FACILITY ID NUMBER
Er	nited States Nyironmental	PART II. CHEMICAL-SPECIFIC INFORMATION		19809LLYSR100L0
	ency Jency			Chem., Cat., or Gen. Mane
				1,1,1-TRICHLOROETHANE
SEC	TION 1. POXIC CHE	MICAL IDENTITY (Important: DO NOT complete thi if you complete Section 2 below.)	is section	
1.1	CAS Mumber (Imp	ortant: Enter only one number exactly as it ap	ppears on the Section 313 list.	
	000	071-55-6		
1.2	Toxic Chemical	or Chemical Category Name (Important: Enter on	nly one name exactly as it appears o	on the Section 313 list.
	1,1	,1-TRICHLOROSTHANE		
1.3	Generic Chemica	l Mame (Important: Complete only if Part I, S	Section 2.1 is checked "yes."	· · · · · · · · · · · · · · · · · · ·
	NA.	4		
SEC	TION 2. MIXTURE C	CMPCNENT IDENTITY (Important: DO NOT complete section if you complete Sec	this tion 1 above.)	
2.1	Generis Chemica	l Name Provided by Supplier (Important: Max. o	of 70 chars., including numbers, let	ters, spaces, and punct.
SEC	TION 3. ACTIVITIES	S AND USES OF THE CHEMICAL AT THE FACILITY	(Important: Check all that apply	. ,
			If produce or import	**************
	Manufacture the toxic	a. [ ] Produce	c. [X] For on-site use/	
3.1	chemical:	b. M Import	d. [X])For sale/distrib	
		4	e. [ ] As a byoroduct	402511
			f. [ ] As an impurity	
	Process			***************************************
3.2	the toxic chemical	a. [ ] As a reactant	c. [ ] As an article co	aronent
	CUETTOT	b. [X] As a formulation component	d. 💢 Repackaging	
2 2	Otherwise use			
٠.٠	the toxic chemical:	a. [] As a chemical processing aid	c. [ ] Ancillary or oth	er use
		b. [X] As a manufacturing aid	*	
Ser	ction 4. VAYTYTTM	MOUNT OF THE POYTO CHENTON ON STOR OF THE PO		
	DURING	AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY THE CALENDAR YEAR	LAD	
4.1		er two-digit code from instruction package.)		
	EPA Form 9250-1 (	Rev. 12/4/93) - Previous editions are obsolets	2.	

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EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTLINUED)

United States Environmental Protection Agency TAL EMCILITY ID NUMBER

1986911/SRIDOLO

Chez., Cat., or Gen. Name

111.1-TRICHEDROSTHAME

3117	romenent stoceocion adency				::::-1313417866147/E ,
SEC	TION 5. RELEASES OF THE TOXIC CHEMICAL	TO THE	ENVIRONMENT ON-SITE		
			A. Total Release (pounds/vear) (enter range code from instructions or estimate)	3. Basis of Estimate (enter code)	C. & Fron Stormager
.1	Pugitive or non-point air emissions	[ ] NA	1200	0	
.2	Stack or point air emissions	KK[X]	УА		
.3	Discharges to receiving Streams or water bodies (enter one name par box)				<b>.</b>
.3.1	Stream or Water Body Name				:
A					
.3.2	Stream or Water Body Name				
.3.3	Stream or Water Body Name				
					¥ 1
.1	Underground injections on-site	KK[X]	YA.		
.5	Releases to land on-site				<u>!-</u> ;
5.1	Lardfill	[X]NA	NA		
5.2	Lard treatment/ application farming	AK[X]	NA		
5.3	Surface impoundment	[X]HA	НА		
5.4	Other disposal	AK[X]	NA		

EPA Form 9350-1 (Rev. 5/14/92) - Previous editions are obsolete.

Range Codes: A = 1-10 pounds; 3 = 11-499 pounds; C = 500 - 999 pounds.



TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

Section 5.3 ADDITIONAL INFORMATION ON RELEASE ENVIRONMENT ON-SITE	S OF THE TOXIC CHEMICAL TO THE		
5.3 Discharges to receiving streams or water bodies (enter one name per box)	A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.3.4 Stream or Water Body Name			
5.3.5 Stream or Water Body Name			
5.3.6 Stream or Water Body Name			

SECTION 6. TRANSFERS OF TR	E TOXIC CHEMICAL IN WASTES T	O OFF-SITE LOCATIONS
6.1 DISCHARGES TO	PUBLICLY OWNED TREATMENT WO	RKS (POTW)
6.1.A Total Quantity Trans	ferred to POTWs and Basis of	Estinate
6.1.A.1 Total Transfers (enter range code	pounds/year) or estimate)	6.1.A.2 Basis of Estimate (enter code)
NA		
6.1.B POTW Name and Locat	tion Information	
6.1.B.1 POTW Name		6.1.B.2 POTW Name
Street Address		Street Address
City	County	City
State	Zip Code	State Zip Code

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1] (example: 1,2,3,etc.)



TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

United States Environmental Protection Agency

SECTION 6.2 TRANSFERS TO OTHER OFF-S	ITE LOCATIONS	
6.2.1 Off-site EPA Identification Nu	mber (RCRA ID No.)	Water to the same of the same
Off-Site Location Name		
Street Address		
City		County
State Zip	Code	Is location under control of reporting [] YES [] NO
A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	B. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1,	1.
2.	2.	2.
3.		3.
4.	4.	4.
SECTION 6.2 TRANSFERS TO OTHER OFF-S	ITE LOCATIONS	
6.2.2 Off-site EPA Identification Nu	aber (RCRA ID No.)	
Off-Site Location Name		
Street Address	F-41, F	
city		County
State Zip	Code	Is location under control of reporting [ ] YES [ ] NO
A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	B. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1.
2.	2.	2.
3.	3.	3.
4.	4.	4.

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [0 ] and indicate which Part II, Sections 6.2 page this is, here. [1 ] (example: 1,2,3,etc.)

United States Environmental Protection Agency

TRI FACILITY ID NUMBER 19809LLYSR100LO Chem., Cat., or Gen. Name 1,1,1-TRICHLOROETHANE

Section 7A. ON-SI	TE WASTE TREATMENT METHODS AND EFFICIENCY			
[ ] Not Applicab any waste st	le (NA) - Check here if no on-site treatme ream containing the toxic chemical or chem	nt is applied to ical category.		
a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
NA	1     2       3     4       6     7       8		. }	Yes No
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
	1     2       3     4     5       6     7     8		å	Yes No
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
	1     2       3     4     5       6     7     8		8	Yes No
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1     2       3     4       6     7		ક	Yes No [ ] [ ]
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1     2       3     4       6     7       8		8	Yes No



TRI FACILITY ID NUMBER

19809LLYSR100L0

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

ection 7B. ON-SITE ENERGY RECOVER	Y PROCESSES				
[0] Not Applicable (NA) - Check h stream	ere if no on-site energy r containing the toxic chemi	ecovery is applied to	o any waste gory.		
Energy Recovery Methods [enter 3-					
1 NA	2	3		4	

Section 7C. ON-SITE RECYCLING PROCESSES							
[0] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category.							
Recycling Methods [enter 3-character code(s)]							
R-11							
1 HA 2	3	4	5				
6 7	8	9	10				
c							

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EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED)

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100L0

Chem., Cat., or Gen. Wame

1,1,1-TRICHLOROETHANE

released *  used for energy on-site  used for energy off-site  recycled on-site	0 0 1820	0 0	0	0	
used for energy off-site	0				
recycled on-site		0	0	0	
	1820				
recycled off-site		4580	4500	1800	
10200 011 0100	0	0	0	0	
treated on-site	0	0		0	
treated off-site	0	0	0	0	
mic events, or one-th	ie events not associated	dedial actions, with		0	
on Ratio or Activity In	ndex	n		0001.31	
your facility engage in eporting year? If not	any source reduction a , enter "NA" In Section	ctivities for this chemic 8.10.1 and answer Sectio	al during n 8.11.		
Source Reduction Activities Methods to Identify Activity (enter codes [enter code(s)]					
NA	a.	b.		3.	
	a.	b.		3.	
45	a.	b.	C	3.	
	a.	b.		2.	
	released to the environic events, or one-time processes (pounds/year Ratio or Activity In rour facility engage in eporting year? If not ree Reduction Activities [enter code(s)]	released to the environment as a result of respective events, or one-time events not associated on processes (pounds/year)  on Ratio or Activity Index  our facility engage in any source reduction a eporting year? If not, enter "NA" In Section are Reduction Activities [enter code(s)]  NA  a.  a.  a.  a.  a.	released to the environment as a result of remedial actions, once events, or one-time events not associated with on processes (pounds/year)  on Ratio or Activity Index  our facility engage in any source reduction activities for this chemic reporting year? If not, enter "NA" In Section 8.10.1 and answer Section activities [enter code(s)]  NA a. b.  a. b.  a. b.	released to the environment as a result of remedial actions, once events, or one-time events not associated with on processes (pounds/year)  on Ratio or Activity Index  our facility engage in any source reduction activities for this chemical during eporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.  cree Reduction Activities [enter code(s)]  NA  a.  b.  a.  b.  a.  b.  a.  b.  a.  b.	

<sup>\*</sup> Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

r print; read instructions before completing f	orm) Approval Expires: 11/92	PAGE 1 OF 9
FORM R	TOYTO CUENTONI DELEVOE	TRI FACILITY ID NUMBER
	INVENTORY REPORTING FORM	19809LLYSR100L0
Section 313 of the Emergency Planning and C also known as Title III of the Superfund Am	Community Right-to-Know Act of 1986, endments and Reauthorization Act	Chem., Cat., or Gen. Name
		1,1,1-TRICHLOROETHANE
1. EPCRA Reporting Center 2 P.O. Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY	. APPROPRIATE STATE OFFICE (See instructions in Appendix F)	Enter "X" here if this is a revision
ee instructions to determine when "Not		For EPA use only
ILITY IDENTIFICATION INFORMATION		
Section 2. TRADE SECRET INFORMATION		
2.1 Are you claiming the toxic chemical ide [ ] Yes (Answer question 2.2; Attach substantiation forms)	X No (Do not answer 2.2	21
that I have reviewed the attached documents and		and belief, the submitted on reasonable estimates using
	fficial	
	Date Signed 06/28/94	***************************************
Y IDENTIFICATION		
tablishment Name COMPANY, INC.	TRI Facility ID Num	ber
	County NEW CASTLE	
	Zip Code 19809-3513	
s (if different from street address)	+	
	PUT LAI	BEL HERE
	FORM R  Section 313 of the Emergency Planning and Calso known as Title III of the Superfund Am  1. EPCRA Reporting Center P.O. Box 3348 Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY  Bee instructions to determine when "Not opplicable (NA)" boxes should be checked.  LLITY IDENTIFICATION INFORMATION  Section 2. TRADE SECRET INFORMATION  2.1 Are you claiming the toxic chemical ide [ ] Tes (Answer question 2.2; Attach substantiation forms)  2.2 If yes in 2.1, is this copy: [ [ FICATION (Important: Read and sign after complete and that the amounts and values the preparers of this report.  title of owner/operator or senior management of PRESIDENT  Y IDENTIFICATION  tablishment Name COMPANY, INC.	FORM R  TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM  Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986, also known as Title III of the Superfund Amendments and Reauthorization Act  1. PCCRA Reporting Center

PAGE 2 OF 9

TRI FACILITY ID NUMBER EPA EPA FORM R
PART I. FACILITY IDENTIFICATION
INFORMATION (CONTINUED) United States 19809LLYSR100LO Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE SECTION 4. FACILITY IDENTIFICATION (Continued) This report contains information for: (Important: check only one) a. [X] An entire facility b. [ ] Part of a facility 4.3 Technical Name Telephone Number (include area code) (302)762-8900 Contact DONALD C GREENFIELD 4.4 Public Telephone Number (include area code) L. STEPHEN BOWERS Contact (302)762-8900 SIC Code 4.5 (4-digit) a. 3479 b. 2899 c. 3489 d. NA e. f. Latitude Longitude Latitude 4.6 Degrees Minutes Seconds Degrees Minutes Seconds and Longitude 039 36 075 30 12 4.7 Dun & Bradstreet Number(s) (9 digits) a. 002341824 b. NA EPA Identification Number(s) (RCRA I.D. No.) (12 characters) 4.8 DED980827919 a. b. NA Facility NPDES Permit Number(s) (9 characters) 4.9 NA a. b. Underground Injection Well Code (UIC) I.D. Number(s) (12 digits) 4.10 a. NA b. SECTION 5. PARENT COMPANY INFORMATION 5.1 Name of Parent Company [X] NA NA 5.2 Parent Company's Dun & Bradstreet Number [X] NA (9 Digits) NA

PAGE 3 OF 9

EPA		EPA FORM R		TRI FACILITY ID NUMBER		
Uni	ted States	PART II. CHEMICAL-SPECIFIC		19809LLYSR100LO		
Pro	tection	INFORMATION		Chem., Cat., or Gen. Name		
Age	ency		Territor	1,1,1-TRICHLOROETHANE		
SECT	TION 1. TOXIC CHE	MICAL IDENTITY (Important: DO NOT complete this secti	on			
1.1	CAS Number (Imp	ortant: Enter only one number exactly as it appears o	on the Section 313 list.			
Ī	000	071-55-6				
1.2	Toxic Chemical	or Chemical Category Name (Important: Enter only one	name exactly as it appears	on the Section 313 list.)		
		,1-TRICHLOROETHANE				
1.3	Generic Chemica	l Name (Important: Complete only if Part I, Section	2.1 is checked "yes."			
	NA					
SECT	י אקודייצדא 2 אחדי	OMPONENT IDENTITY (Important: DO NOT complete this				
+		section if you complete Section 1				
2.1	Generic Chemica NA	l Name Provided by Supplier (Important: Max. of 70 ch	mars., including numbers, lo	etters, spaces, and punct.)		
SECT	PION 3. ACTIVITIE	S AND USES OF THE CHEMICAL AT THE FACILITY (Imp	portant: Check all that app	ly.)		
	Manufacture		If produce or impor	rt:		
	the toxic chemical:	a. [ ] Produce	c [X] For on-site use/processing			
3.1		b. [X] Import	d. [X])For sale/distribution			
			e. [ ] As a byproduct			
			f. [ ] As an impurity			
	Process					
3.2	the toxic chemical	a. [] As a reactant	c. [ ] As an article	component		
		b. [X] As a formulation component	d. [X] Repackaging			
	Otherwise use					
3.3		a. [ ] As a chemical processing aid	c. [ ] Ancillary or other use			
		b. [X] As a manufacturing aid				
Sec	ction 4. MAXIMUM DURING	AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME THE CALENDAR YEAR				
4.1	03 (Ent	er two-digit code from instruction package.)				
<del> </del>		(Pey 12/4/93) - Provious editions are obsolute				

PAGE 4 OF 9

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED) 19809LLYSR100LO Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE SECTION 5. RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE A. Total Release (pounds/year) B. (enter range code from Basis of C. % From Estimate Stormwater instructions or estimate) (enter code) 5.1 Fugitive or non-point air emissions [ ]NA 2400 0 5.2 Stack or point air emissions [X]NA NA Discharges to receiving streams or water bodies 5.3 (enter one name per box) 5.3.1 Stream or Water Body Name NA 5.3.2 Stream or Water Body Name 5.3.3 Stream or Water Body Name Underground injections on-site 5.4 [X]NA NA 5.5 Releases to land on-site 5.5.1 Landfill [X]NA ΝÀ Land treatment/ application farming 5.5.2 [X]NA NA 5.5.3 Surface impoundment [X]NA Other disposal [X]NA NA [ ] Check here only if additional Section 5.3 information is provided on page 5 of this form.

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED) 19809LLYSR100LO Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 5.3 ADDITIONAL INFORMATION ON RELEASES OF THE TOXIC CHEMICAL TO THE ENVIRONMENT ON-SITE 5.3 Discharges to receiving A. Total Release (pounds/year) Basis of % From streams or water bodies (enter range code from Estimate Stormwater (enter one name per box) instructions or estimate) (enter code) 5.3.4 Stream or Water Body Name 5.3.5 Stream or Water Body Name 5.3.6 Stream or Water Body Name SECTION 6. TRANSFERS OF THE TOXIC CHEMICAL IN WASTES TO OFF-SITE LOCATIONS 6.1 DISCHARGES TO PUBLICLY OWNED TREATMENT WORKS (POTW) 6.1.A Total Quantity Transferred to POTWs and Basis of Estimate 6.1.A.1 Total Transfers (pounds/year) (enter range code or estimate) 6.1.A.2 Basis of Estimate (enter code) 6.1.B POTW Name and Location Information 6.1.B.1 POTW Name 6.1.B.2 POTW Name Street Address Street Address City County City County State Zip Code State Zip Code If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [ ] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1 ] (example: 1,2,3,etc.)

EPA Form 9250-1 (Rev. 12/4/93) - Previous editions are obsolete.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

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EPA		EPA FORM R				TRI FACILITY ID NUMBER	
United States Environmental			19809LLYSR100L0				
Protection Agency		INFORMATION (CONTIN	OED)			Chem., Cat., or Gen. Name	
SECTION 6.2 TRANSFERS TO OTHER	OFF-SITE I	LOCATIONS	800 D94 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			+	
6.2.1 Off-site EPA Identificati	******	****************					
GAD093380814							
Off-Site Location Name CHEMIC			•				
Street Address 1612 JAMES P.	ROGERS CIF	RCLE					
City VALDOSTA	+				County LOWNDES		
State GA	Zip Code	31601-	Is location under co	ntrol	of reportin	g [] YES [X] NO	
A. Total Transfers (pounds/year (enter range code or estimate	) e)	B. Basis of Estimate (enter code)		B. T	ype of Waste ecycling/Ene	Treatment/Disposal/ rgy Recovery (enter code)	
1. 2730	-90000000	1. 0		1. 1	M54		
2. NA	19000000000	2.		2.			
3.	3.			3.			
4.	4.			4.			
SECTION 6.2 TRANSFERS TO OTHER (	FF-SITE L	OCATIONS					
6.2.2 Off-site EPA Identification	n Number	(RCRA ID No.)	- A	9000-			
Off-Site Location Name	.64644000	644-10000004-1	99 G W & 3 W 9 D 22 A 9 B 9 B 8 B 8 B 8 B 8 B 8 B 8 B 8 B 8 B				
Street Address	16000000	7966 P444 606 669 668 978 84	100000000000000000000000000000000000000		**********		
City					County		
State	Zip Code		T_ 1				
A. Total Transfers (pounds/year)			Is location under cor				
(enter range code or estimate		B. Basis of Estimate (enter code)		B. Ty Re	ype of Waste ecycling/Ener	Treatment/Disposal/ rgy Recovery (enter code)	
1.		1.	6 TA 6 6 6 TA 6 C C C C C C C C C C C C C C C C C C	1.			
2.		2.					
3.	99000EE	3.		3.			
4.	700000000	4.		4.			
If additional pages of Part II, this box [ ] and indicate whic	Section 6 h Part II,	6.2 are attached, indic , Sections 6.2 page thi	ate the total number of sis, here. [1] (example: 1,2,3,e	of pag	res in		
PD1 Rown 0350 1 /Day 13/4/0	1\ Dwg!	1111		,			

PAGE 7 OF 9

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED) 19809LLYSR100L0 Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY [X] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category. a. General b. Waste Treatment Method(s) Sequence
 [enter 3-character code(s)] d. Treatment
Efficiency
Estimate c. Range of Influent e. Based on Waste Stream (enter code ) Concentration Operating Data? 7A.1b 7A.1c 7A.1d 7A.1e 7A.1a 2 Yes No 5 NA 8 7A.2b 7A.2c 7A.2d 7A.2e 7A.2a 2 Yes No 5 7A.3b 7A.3c 7A.3d 7A.3e 7A.3a 2 Yes No 5 of 8 7A.4b 7A.4C 7A.4d 7A.4e 7A.4a 2 Yes No 5 8 ] 8 7A.5b 7A.5c 7A.5d 7A.5e 7A.5a 2 Yes No 5 00 If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here [1].

PAGE 8 OF 9 EPA TRI FACILITY ID NUMBER EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED) United States 19809LLYSR100L0 Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 7B. ON-SITE ENERGY RECOVERY PROCESSES [X] Not Applicable (NA) - Check here if no on-site energy recovery is applied to any waste stream containing the toxic chemical or chemical category. Energy Recovery Methods [enter 3-character code(s)] Section 7C. ON-SITE RECYCLING PROCESSES [ ] Not Applicable (NA) - Check here if no on-site recycling is applied to any waste stream containing the toxic chemical or chemical category. Recycling Methods [enter 3-character code(s)]

PAGE 9 OF 9

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED) 19809LLYSR100LO Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES All estimates can be reported using up to two significant Column A Column B Column C Column D 1992 1993 1994 1995 figures. (pounds/year) (pounds/year) (pounds/year) (pounds/year) 8.1 Quantity released \* 1200 (1200) 300 0 2400 Quantity used for energy 8.2 recovery on-site 0 0 0 0 Quantity used for energy recovery off-site 0 0 0 Quantity recycled on-site 4580 1800 0 0 Quantity recycled off-site 0 0 0 0 Quantity treated on-site 0 0 0 0 Quantity treated off-site 2730 3000 0 Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year) 8.9 | Production Ratio or Activity Index 0001.01 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11. 8.10 Source Reduction Activities Methods to Identify Activity (enter codes) fenter code(s)] 8.10.1 NA a. b. C. 8.10.2 a. b. C. 8.10.3 a. b. c. 8.10.4 a. b. C. Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) NO [X] Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

(1993)

Form Approved OMB Number: 2070-0093 Approval Expires: 11/92 (IMPORTANT: Type or print; read instructions before completing form) PAGE 1 OF 9 TRI FACILITY ID NUMBER TOXIC CHEMICAL RELEASE INVENTORY REPORTING FORM 19809LLYSR100LO Section 31s of the Emergency Planning and Community Right-to-Know Act of 1986, Chem., Cat., or Gen. Name also known as Title III of the Superfund Amendments and Reauthorization Act Environmental Protection Agency 1,1,1-TRICHLOROETHANE 1. EPCRA Reporting Center 2. APPROPRIATE STATE OFFICE P.O. Box 3348
Merrifield, VA 22116-3348
ATTN: TOXIC CHEMICAL RELEASE INVENTORY WHERE TO SEND (See instructions in Appendix F) COMPLETED FORMS: Enter "X" here if this is a revision For EPA use only IMPORTANT: See instructions to determine when "Not Applicable (NA)" boxes should be checked. PART I. FACILITY IDENTIFICATION INFORMATION SECTION 1. Section 2. TRADE SECRET INFORMATION Are you claiming the toxic chemical identified on page 3 trade secret?
[] Yes (Answer question 2.2;
Attach substantiation forms)

Go to Section 3) REPORTING YEAR Go to Section 3) 1992 2.2 If yes in 2.1, is this copy: [ ] Sanitized [ ] Unsanitized SECTION 3. CERTIFICATION (Important: Read and sign after completing all form sections.) I hearby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on reasonable estimates using data available to the preparers of this report. Name and official title of owner/operator or senior management official L. STEPHEN 3CWERS, PRESEDENT Signature Date Signed 46/30793 SECTION 4. FACILITY IDENTIFICATION Facility or Establishment Name TRI Facility ID Number 19809LLYSR100LO ALLOY SURFACES CO., INC. Street Address 100 LOCKE ROAD County WILMINGTON NEW CASTLE State Zip Code 19809-3513 DE Mailing Address (if different from street address) City PUT LABEL HERE State Zip Code

PAGE 2 OF 9 TRI FACILITY ID NUMBER

PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

19809LLYSR100LO

Chem., Cat., or Gen. Mame

1,1,1-TRICHLOROETHANE

United States Environmental Protection Agency

ION 4. FACILI	TY IDENTIFICATIO	N (Continued)						
This report (Important:	contains inform check only one)	ation for:	[X] An entire	facili	y Y	b. [ ] Part of a	facility	
Technical Name Contact DONALD C GREENFIELD Telep					Telephone Number (include area code) (302)762-8900			
Public Contact				phone Number (inc (302)76	lude area code) 2-8900			
SIC Code (4-digit)	a. 3479	b. 2899	c. 3489		d. NA	e.	f.	
Latitudo		Latitude		- F		Longitude		
and	Degrees	Minutes	Seco	nds	Degrees	Minutes	Seconds	
Longitude	039	44	36		075	30	12	
Dun & Brads	treet Number(s)	(9 digits)			a.	0023418	24	
			¥2 70		b.	NA		
B EPA Identification Number(s) (RCRA I.D. No.) (12 characters)					a.	a. DED980827919		
					b.	NA		
Facility NP	DES Permit Number	r(s) (9 characters	3)		a.	NA		
:		<del></del>		ā.	b.			
Underground Number(s)	Injection Well (	Code (UIC) I.D. (12 digits)	·		a.	NA		
(								
ION 5. PARENT	COMPANY INFORMAT	MOI						
Name of Paren	t Company							
] NA		MATEC	CORP					
arent Compan	y's Dun & Bradstr	eet Number						
] NA	(9 Dig	gits) 002341	824					
	This report (Important: Technical Contact  Public Contact  SIC Code (4-digit)  Latitude and Longitude  Dun & Brads  EPA Identif  Facility NP  Underground Number(s)	This report contains inform (Important: check only one)  Technical check only one)  Technical Name Contact  Public Name L. STEPHEN BOWE  SIC Code (4-digit)  Latitude Degrees  and Longitude 039  Dun & Bradstreet Number(s)  EPA Identification Number(s  Facility NPDES Permit Number  Underground Injection Well (Number(s))  Underground Injection Well (Number(s))  ION 5. PARENT COMPANY INFORMATION OF Parent Company  [] NA  Parent Company's Dun & Bradstreet Number (s)	Technical Contact DONALD C GREENFIELD  Public Contact L. STEPHEN BOWERS  SIC Code (4-digit) a. 3479 b. 2899  Latitude Degrees Minutes  and Longitude 039 44  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)  ION 5. PARENT COMPANY INFORMATION  Name of Parent Company  [] NA MATEC  Parent Company's Dun & Bradstreet Number	This report contains information for:  [Inportant: check only one)  Technical Contact  Public Contact  Name DONALD C GREENFIELD  Public Contact  L. STEPHEN BOWERS  SIC Code (4-digit)  Latitude  Degrees Minutes Secon Minutes  Longitude  Degrees Minutes  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s)  Underground Injection Well Code (UIC) I.D. Number(s)  Underground Injection Well Code (UIC) I.D. Number(s)  ION 5. PARENT COMPANY INFORMATION  Name of Parent Company  [] NA MATEC CORP  Parent Company's Dun & Bradstreet Number	This report contains information for:  [Inportant: check only one]  Technical Contact DONALD C GREENFIELD  Public Contact L. STEPHEN BOWERS  SIC Code (4-digit)  Latitude  Degrees Minutes Seconds  Longitude Degrees Minutes Seconds  Longitude Degrees Minutes  EPA Identification Number(s) (9 digits)  EPA Identification Number(s) (9 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s)  Underground Injection Well Code (UIC) I.D. Number(s)  ION 5. PARENT COMPANY INFORMATION  Hame of Parent Company  [] NA MATEC CORP  Parent Company's Dun & Bradstreet Number	This report contains information for:  (Important: check only one)  Technical Contact  Name DONALD C GREENFIELD  Telephone Number (inc (302)76  Public Contact L. STEPHEN BOWERS  Telephone Number (inc (302)76  SIC Code (4-digit)  a. 3479 b. 2899 c. 3489 d. NA  Latitude and Longitude  Degrees Minutes  Seconds  Degrees  Minutes  Seconds  Degrees  Dona & Bradstreet Number(s) (9 digits)  a.  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  b.  Pacility NPDES Permit Number(s) (9 characters)  Dunderground Injection Well Code (UIC) I.D. Number(s)  (12 digits)  MA  MATEC CORP  Parent Company's Dun & Bradstreet Number	This report contains information for:  [Important: check only one]  Technical Contact Name Contact DOMALD C GREENFIELD  Telephone Number (include area code) (302)762-8900  Public Contact I. STEPHEN BOWERS  Telephone Number (include area code) (302)762-8900  SIC Code (4-digit) a. 3479 b. 2899 c. 3489 d. NA e.  Latitude Degrees Minutes  Latitude Degrees Minutes  Seconds Degrees Minutes  Longitude  Domain Bradstreet Number(s) (9 digits)  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (8CRA I.D. No.) (12 characters)  Dun Mah  Facility NPDES Permit Number(s) (9 characters)  Dun Mah  Facility NPDES Permit Number(s) (9 characters)  Dun Mah  Facility NPDES Permit Number(s) (12 digits)  Dun Mah  MATEC CORP	

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EPA

EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROFTHANE

_	
SECT	ION 1. TOXIC CHEMICAL IDENTITY (Important: DO NOT complete this section if you complete Section 2 below.)
1.1	CAS Number (Important: Enter only one number exactly as it appears on the Section 313 list.
	000071-55-6
2	Toxic Chemical or Chemical Category Name (Important: Enter only one name exactly as it appears on the Section 313 list.)
	1,1,1-TRICHLOROETHANE
.3	Generic Chemical Name (Important: Complete only if Part I, Section 2.1 is checked "yes."
	NA
ECI	ION 2. MIXTURE COMPONENT IDENTITY (Important: DO NOT complete this section if you complete Section 1 above.)
.1	Generic Chemical Name Provided by Supplier (Important: Max. of 70 chars., including numbers, letters, spaces, and punct.)

SEC.	PION 3. ACTIVITIES	AND USES OF THE CHEMICAL AT THE FACILITY	(Important: Check all that apply.)	
	Manufacture the toxic chemical:	a. [ ] Produce	If produce or import:  c. [X] For on-site use/processing	
3.1		b. [X] Import	d. [ ] For sale/distribution	
	47		e. [ ] As a byproduct	
	4		f. [ ] As an impurity	
3.2	Process the toxic chemical	<ul><li>a. [ ] As a reactant</li><li>b. [X] As a formulation component</li></ul>	c. [] As an article component d. [X] Repackaging	
1.3	Otherwise use the toxic chemical:	<ul><li>a. [ ] As a chemical processing aid</li><li>b. [X] As a manufacturing aid</li></ul>	c. [ ] Ancillary or other use	

Secti	on 4.	MAXIMUM AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TIME DURING THE CALENDAR YEAR	
4.1	03	(Enter two-digit code from instruction package.)	

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EPA

EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED)

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100L0

Chen., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

SEC)	TION 5. RELEASES OF THE TOXIC CHEMI				
		CAL TO THE	ENVIRONMENT ON-SITE		
			A. Total Release (pounds/year) (enter range code from instructions or estimate)	B. Basis of Estimate (enter code)	C. % From Stormwater
5.1	Pugitive or non-coint air emissions	[ ]NA	B 1200	0	
5.2	Stack or point air emissions	[X]NA	NA		
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name				
NA					
522	Stream or Water Body Name				
3.3.4	person or warer poul name				
			2		
5.3.3	Stream or Water Body Name			x	
					4.182
					300000000000000000000000000000000000000
5.4	Underground injections	(VIV)	W)		
5.4	Underground injections on-site	[X]NA	NA		
		[X]NA	NA		
	Underground injections on-site: Releases to land on-site	AK[X]	NA		
5.5	Releases to land on-site				
	Releases to land on-site	[X]NA	NA NA		
5.5.1	Releases to land on-site				
5.5.1	Releases to land on-site				
5.5.1	Releases to land on-site  Landfill  Land treatment/ application farming	[X]NA	NA		
5.5	Releases to land on-site	[X]NA	NA		
5.5.1	Releases to land on-site  Landfill  Land treatment/ application farming	[X]NA	NA NA		
5.5.1	Releases to land on-site	[X]NA	NA		

EPA Form 9350-1 (Rev. 5/14/92) - Previous editions are obsolete.

Range Codes: A = 1-10 pounds; B = 11-499 pounds; C = 500 - 999 pounds.

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EPA

EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED)

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

Section 5.3 ADDITIONAL INFORM ENVIRONMENT ON-SI	ATION ON RELEASES OF TE	THE TOXIC CHE	MICAL TO	THE			
5.3 Discharges to receiving streams or water bodies (enter one name per box		A. Total Re (enter r	elease (por range code cions or e	from	B. Basis of Estimate (enter cod	125-11-11-1	% From Stormwater
5.3.4 Stream or Water Body N	ane						
5.3.5 Stream or Water Body N	ane						
5.3.6 Stream or Water Body N	ane						
	BLICLY OWNED TREATMEN	TT WORKS (POTW	I)	IS			
6.1.A Total Quantity Transfer	red to POTWs and Basi	s of Estimate			3 * - T T T Y 2		
6.1.A.1 Total Transfers (pou (enter range code or	nds/year) estimate)		6.1.A.2	Basis of Es (enter code	timate		
NA						3, 2 55,	
6.1.B POTW Name and Location	Information						
6.1.B.1 POTW Name			6.1.B.2 POTW Name				
Street Address		F	Street	Address			
City	County		City			County	
State	State Zip Code			State Zip Code			

If additional pages of Part II, Sections 5.3 and/or 6.1 are attached, indicate the total number of pages in this box [1] and indicate which Part II, Sections 5.3/6.1 page this is, here. [1] (example: 1,2,3,etc.)



United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

SECTION 6.2 TRANSFERS TO OTHER OFF-SITE	LUCTULAR	•	
6.2.1 Off-site EPA Identification Number			
over our size my identification number	er (NCAA ID NO.)		
Off-Site Location Name			
Street Address			
City			County
State Zip Co	ode	Is location under cont	rol of reporting [ ] YES [ ] NO
A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	В	. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1	•
2.	2.	2	
3.	3.	3	
4.	4.	4	
SECTION 6.2 TRANSFERS TO OTHER OFF-SITE	LOCATIONS		
6.2.2 Off-site EPA Identification Number	er (RCRA ID No.)		
Off-Site Location Name			
Street Address			NAMES OF THE PARTY
City	il a		County
State Zip Co	de	Is location under cont	rol of reporting [ ] YES [ ] NO
A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	В	. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)
1.	1.	1	
2.	2.	2	
3.	3.	3	
4.	4.	4	

If additional pages of Part II, Section 6.2 are attached, indicate the total number of pages in this box [0] and indicate which Part II, Sections 6.2 page this is, here. [1] (example: 1,2,3,etc.)

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EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED)

United States Environmental Protection Agency TRI FACILITY ID NUMBER

19809LLYSR100L0

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

Section 7A. ON-SI	ITE WASTE TREATMENT METHODS AND EFFICIENCY			
	ole (NA) - Check here if no on-site treatment tream containing the toxic chemical or chem	ent is applied to		
a. General Waste Stream (enter code)	b. Waste Treatment Method(s) Sequence [enter 3-character code(s)]	c. Range of Influent Concentration	d. Treatment Efficiency Estimate	e. Based on Operating Data?
7A.1a	7A.1b	7A.1c	7A.1d	7A.1e
NA	1     2       3     4     5       6     7     8		. 3	Yes No
7A.2a	7A.2b	7A.2c	7A.2d	7A.2e
	1     2       3     4     5       6     7     8		8	Yes No
7A.3a	7A.3b	7A.3c	7A.3d	7A.3e
-/1-12	1     2       3     4       6     7		3	Yes No [ ] [ ]
7A.4a	7A.4b	7A.4c	7A.4d	7A.4e
	1     2       3     4     5       6     7     8		8	Yes No
7A.5a	7A.5b	7A.5c	7A.5d	7A.5e
	1     2       3     4     5       6     7     8		\$	Yes No [ ] [ ]

If additional pages are attached, indicate the total number of pages in this box [1] and indicate which page this is, here [1].

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United States
Environmental Protection Agency

EPA FORM R
PART II. CHEMICAL-SPECIFIC
INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER

19809LLYSR100L0

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

Section 7B. ON-SITE ENERGY RECOVE	RY PROCESSES			
[0] Not Applicable (NA) - Check stream	here if no on-site energy recontaining the toxic chemica	overy is applied to any waste		
Energy Recovery Methods (enter 3				
				7
1 NA	2	3	, ,	
, And		,	4	

Section 7C. ON-SITE RECYCLING PROCESSES		7-	
[0] Not Applicable (NA) - Check here if no on-s stream containing the	ite recycling is applied t toxic chemical or chemica	o any waste 1 category.	
Recycling Methods [enter 3-character code(s)]			
R-11			_
1 NA 2	3	4	5
6 7	8	9	10
C .			

PAGE 9 OF 9



United States Environmental Protection Agency

# EPA FCRM R PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER

19809LLYSR100L0

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

usi	estimates can be reported ng up to two significant ures.	Column A 1991 (pounds/year)	Column B 1992 (pounds/year)	Column C 1993 (pounds/year)	Column D 1994 (pounds/year)	
8.1	Quantity released *	1200	1200	1200	600	
8.2	Quantity used for energy recovery on-site	0	0	0	0	
8.3	Quantity used for energy recovery off-site	0	0	0	0	
8.4	Quantity recycled on-site	1820	4580	4500	1800	
8.5	Quantity recycled off-site	0	0	0	0	
8.6	Quantity treated on-site	0	0	0	0	
8.7	Quantity treated off-site	0	0	0	0	
8.8	Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year)					
8.9	roduction Ratio or Activity Index 0001.31					
Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11.						
	Source Reduction Activi [enter code(s)]	ties	Methods to Identify Activity (enter			
8.10	.1 NA	a.	b.	b.  c.		
3.10.2		a.	b.	b. c.		
8.10.3		a.	b.	b. c.		
8.10.4		a.	b.	c.		

<sup>\*</sup> Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

EPA Form 9350-1 (Rev. 5/14/92) - Previous editions are obsolete.

(1992)



March 23, 1995

US Environmental Protection Region III 841 Chestnut Bldg. Philadelphia, PA 19107

ATTN: Malcolm Reynolds, Mail 3AT1Z

SUBJECT: "R" Form revision

Dear Sir:

Enclosed please find Alloy Surfaces revised 1992 and 1993 EPA "R" forms. Revisions were made concerning 1,1,1 Trichloroethane.

Sincerely,

ALLOY SURFACES COMPANY, INC.

Donald C. Greenfield Compliance Manager

DCG/rlk Enclosures



# NOTICE OF INSPECTION

# U.S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA)

DATE INSPECTOR NO. DAILY SEQ. NO.  Feb. 9.778 ERIII-001  4. INSPECTOR ADDRESS U.S. EPA REGION 3 (3AT/2)  841 Chestnut Building Philadelphia, PA 19107  DAILY SEQ. NO.  10:30 A //oy Surfaces Co. Inc.  5. FIRM ADDRESS 100 Locke Rd.  Willmington, DE 19809	1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME	
4 INSPECTOR ADDRESS U.S. EPA REGION 3 (3AT/2)  5. FIRM ADDRESS 100 Locke Rd.	LAIL		DAILY SEQ. NO.	10:30	Alloy Surfaces Co. Inc.	
Philadelphia, PA 1910/	4. INSPECTOR A	ADDRESS EPA REGION 3			5. FIRM ADDRÉSS 100 Locke Rd. W/i/mington, DE 19809	

**REASON FOR INSPECTION**: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986, Section 313 toxic chemical release reporting requirements. The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE  Malcolm Reynolds		Donald Greenfuld	
NAME MALCOLM REYNOLDS	2 5 E	DOWALD GREENFIELD	1 m 2 m
TITLE TECHNICAL ASSISTANT	2/9/95	SR. Technical Adversor	DATE SIGNED

Purchases

ANOY SURFACE Co Inc 111 Tel. Chloro et hane

1990 - 4200 gre - 46,200 lbs

1991 - 3900 gm - 42,900 lbs

1992 - 5100 gal - 56,100 lbs

1993 - 5200 gal - 57,200 lbs

Inal hereful & pal 9,1995

#### SARA TITLE III SECTION 313 INSPECTION REPORT 94-3130-017

I. Facility

Alloy Surfaces Co., Inc. 100 Locke Road Wilmington, DE 19809-3513

3479

Date of Inspection II.

2/9/95
III. EPA Inspector
Malcolm Reynolds

IV. Company Officials

Donald Green field - Consultant 302-762-8900

v. Purpose of Inspection

> Alloy Surfaces Co., Inc. is a manufacturer of and has submitted a Form R under Section 313 of SARA Title III for the following reporting years: (991, 1992, 1993). This inspection was conducted to inspect, document, and verify the facility's compliance with the reporting requirements stated in 40 C.F.R. Part 372 under Section 313 of SARA Title III. Specifically, the purposes of this inspection are to investigate the quality of the toxic release inventory data reported by the facility and to verify the appropriate threshold determination calculations for chemicals which the facility has not submitted a toxic chemical release form for.

#### VI. Opening Conference

#### 1. Inspection Procedures and General Information

on Feb. 9, 1995, a Section 313 inspection was conducted at Alloy Surfaces Co. Inc. . Approximately 5 days prior to the inspection a letter was sent to the company confirming the date of the inspection (attachment D). The EPA inspector met with company representatives at 101300m. The inspector's credentials were presented and a Notice of Inspection was presented and explained. Mr. Green field signed the notice and an outline of the areas to be investigated was discussed.

### 2. Pacility Description

Alloy Surfaces Co., Inc is publically owned.

Mr. Green field is responsible for environmental matters. The Wilming ton, DE plant is the only plant and serves as the headquarters as well. The facility produces electrometalugical Floor space was said to be square feet.

Products. Special alloys are fused on to articles to give them special properties such as heat resistance:

#### VII. SARA Title III

Section 313 was the primary focus of the inspection. The facility was phoned prior to the inspection to determine if an inspection was warranted (attachment E). In addition, compliance with Sections 302,311, and 312 was checked. A copy of the letter sent to the facility confirming the date of inspection (attachment D) was sent to the Superfund Removal Branch to allow them the option to further investigate compliance with Sections 302, 311, and 312 at their discretion.

A plant, factory, or other facility comes under the provisions of Section 313:

- If it conducts manufacturing operations (that is if its primary Standard Industrial Classification Code (SIC) is from 2000 through 3999;
- If, in addition, it has 10 or more full-time employees; and
- 3. If it manufactures (including imports) or processes more than 75,000 pounds of a listed toxic chemical during any calendar year 1987 or manufactures (including imports) or processes more than 50,000 lbs. during calendar year 1988, or manufactures (including imports) or processes more than 25,000 lbs. during calendar year 1989 or later, or otherwise uses more than 10,000 pounds of a listed toxic chemical during any calendar year.

Mr. Green field stated that the plant's primary SIC Code is 3479 and the plant had 45,50,470 employees in the following calendar years: 1991, 1992, and 1993 respectively. The remainder of the inspection involved determining if the plant manufactured, processed, or otherwise used any one of

the listed toxic chemicals in excess of the thresholds in calendar years 19% and 19%.

Mr. Green field stated that the facility does not manufacture any chemicals at their plant and no chemicals are imported into the facility.

For the inspection, they had compiled summaries of usages of Section 313 chemicals as shown in attachment #1. Copies of the toxic chemical release forms inspected are included as attachment 2. All documentation supporting the figures in the toxic chemical release forms are included as attachment 3. According to attachments 1 and 2, the usage of Section 313 chemicals and releases reported are summarized as follows, (all figures in lbs.).

Ye	ear Chemical	Usage	Total Releases	Offsite Transfers
1992	11/1 Trichloroeth	ane 56,100V	1200	0
1993	1,1,1-Trichloroethan	e 57,200°	2400	2730

R	ecycled	Treated	8014
1992	4580	0	54,900
1993	1800	2730	52,070

1,1,1 Trichlore ethane is used for formulation component processed , and is

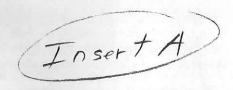
(processed/otherwise-used.

(processed/otherwise-used.

Insert A)

### VIII. Closing Conference

Appropriate documents were requested by the EPA Inspector and the SARA Title III Section 313 investigation was concluded.



Mistakes on 1993 Form R for 11,1-Trichbrethon Used 1992 Form R instead of the 1993 form.

Section 3. 1

B. Import - Purchased from distributor who imported the chemical. This is not to be marked imported unless it is purchased directly from foreign company.

C. +cl. Not to be marked unless chemical is produced or imported.

8.1 Should have been 2400 lbs/yr, instead of 1200

Mistakes on 1992 Form R for 1,11-trickloroethome Section 3.1 b. Import-Marked import but shouldn't have. C. Marked erroneously 6.2.1 Didn't mark IVA 7A Didn't mark NA Receipt for Samples and Documents was filled out at the end of all inspection activities.

#### IX. Attachments

- A. Notice of Inspection
- B. Receipt for Samples and Documents
- C. FTTS Summary
- D. Letter to Facility Confirming Date of Inspection
- E. Initial telephone call record.
- 1. Summary of Section 313 chemicals used
- 2. Toxic Chemical Release Forms
- 3. Supporting Documentation for Figures in Toxic Chemical Release Forms.

### X. Summary of Findings

Alloy Surfaces Co. Incsubmitted Form Rs under Section 313 for the following reporting years: 1992 1993. The records showed that the facility had greater than 10 employees (50) and is a manufacturer (SIC Code 3479). In addition, the records showed that the Section 313 chemicals:

The facility has submitted Form Rs for the following chemical (all figures in lbs.):

	Chemical	Usage	Total Releases	Offsite Transfers
1992	141 Trichloroet	hane Formulation	1200	0
1993	"	Component	2400	2730
Recov	ered/Recycle	4	Treated	
4	1580		O	
12	900		2730	

(Comments)

Th	e facility	has exc	ceeded the	statutory	thresholds	for the
followi	ng chemica report.	ls, but	has not s	submitted a	toxic chem	ical

Year

Usage (lbs).

Activity Report Due

Date Submitted

EPA	CODY D				
	FORM R	TOXIC CHEMICAL	RELEASE	TRI FACILITY ID N	MER
United States Environmental	Soction 212 of the Target	INVENTORY REPO	14.	19809LLYSR100L0	
Protection Agency	also known as Fitle III of the Superfund	Amendments and Res	to-Know Act of 1986, authorization Act	Chem., Cat., or G	en. Yan
		***********		1,1,1-TRICHLOROET	ain.
WHERE TO SEND COMPLETED FORM	1. ZPCRA Reporting Center P.O. Box 3348 MS: Merrifield, VA 22116-3348 ATTN: TOXIC CHEMICAL RELEASE INVENTORY	2. APPROPRIATE ST (See instructi	PATE OFFICE Cons in Appendix ?)	Enter "X" here if	
IMPORTANT:	See instructions to determine when "Mot Applicable (MA)" boxes should be checked.			For EPA use only	
		::		***************************************	
FART	FACILITY IDENTIFICATION INFORMATION		5 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	, 98699999999999999999999999999999999999	
SECTION 1.	Section 2. TRADE SECRET INFORMATION		*********************		
REPORTING YEAR	2.1 Are you claiming the toxic chemical id [ ] Tes (Answer question 2.2; Attach substantiation forms)	1 1 1 30	100 not answer 2 2.		
1000		G0	to Section 3)		
1993	2.2 If yes in 2.1, is this copy:	[ ] Sanitized	[ ] Unsanitized		
		[ ] Sanitized	[ ] Unsanitized		
SECTION 3. CE I hearby certifinformation is iata available	ERTIFICATION (Important: Read and sign after comply that I have reviewed the attached documents and true and complete and that the amounts and value to the preparers of this report.	[ ] Sanitized  pleting all form so  d that, to the bes  s in this report	[] Unsanitized	d belief, the submit reasonable estimates	ted S using
SECTION 3. CE I hearby certifinformation is iata available Name and offici . STEPHEN 30ME	ERTIFICATION (Important: Read and sign after comply that I have reviewed the attached documents and true and complete and that the amounts and value to the preparers of this report.	[ ] Sanitized  pleting all form so  d that, to the bes  s in this report	[] Unsanitized	d belief, the submit reasonable estimates	ted S Using
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SECTION 3. CE I hearby certifinformation is data available Name and offici STEPHEN 30WE Signature  ECTION 4. FACIL Facility or ALLOY SURFAC Street Addre	The stablishment Name case of the stablishment Name case companies and sign after companies and complete and that the amounts and value to the preparers of this report.  All title of owner/operator or senior management case, president	oleting all form so that, to the best in this report official	[ ] Unsanitized ections.) st of my knowledge and are accurate based on  23 Mar. 95		ad a maing
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EPA United States Environmental Protection Agency

# EPA FORM R PART I. FACILITY IDENTIFICATION INFORMATION (CONTINUED)

TRI FACILITY ID NUMBER

19809LLYSR100LO

Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

ncy								1 1 1 - MDICHT ODGERWARD
	TOTAL TATAL TOTAL	· · · · · · · · · · · · · · · · · · ·		**********			200000000000000000000000000000000000000	1,1,1-TRICHLOROETHANE
*********			d)					
This report (Important:	contains informa check only one)	tion for:	a. [X]	An entire	facility		b. [ ] Part o	of a facility
Technical Contact				one Number (inclu (302)762-	de area code) 8900			
Public Contact				one Number (inclu	de area code)			
SIC Code (4-digit)	a. 3479	b. 2899		c. 3489		d. NA	e.	f.
Totituda		Latit	ude				Longitu	ide
and	Degrees	Minute	es	Seco	nds	Degrees	Minute	s Seconds
Longitude	039		44	36		075	30	12
Dun & Brads	treet Number(s) (	digits)	in the second			a.	002	341824
		1999000000				b.	NA	
EPA Identif	ication Number(s)	(RCRA I.D.	. No.)			a. DED980827919		
- 4 - 2 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3						b. NA		
Facility NP	DES Permit Number	(s) (9 chai	racters)			a. NA		
-98005054840	985800000000000000000000000000000000000			200000000		b.		
Underground Number(s)	Injection Well Co	ode (UIC) 1	I.D.			a. NA		
		(11 419	1200000000			b.		
ON 5. PARENT	COMPANY INFORMAT	ON						
Name of Paren	t Company				7000000	900045	900000000000	
[X] NA			NA					
Parent Compan	y's Dun & Bradstre	et Number						
[X] NA	(9 Digi	.ts)	NA					
	This report (Important: Technical Contact  Public Contact  SIC Code (4-digit)  Latitude and Longitude  Dun & Brads  EPA Identif  Facility NP  Underground Number(s)  ON 5. PARENT Hame of Paren  [X] NA Parent Compan	This report contains informat (Important: check only one)  Technical Name Contact Name Contact L. STEPHEN BOWERS  SIC Code (4-digit) a. 3479  Latitude Degrees and Longitude 039  Dun & Bradstreet Number(s) (9)  EPA Identification Number(s)  Facility NPDES Permit Number(s)  Underground Injection Well Contact Number(s)  Underground Injection Well Contact Number(s)  In S. PARENT COMPANY INFORMATION (S)  All Name of Parent Company  [X] Name Parent Company's Dun & Bradstrees	This report contains information for: (Important: check only one)  Technical Name Contact DONALD C GREENFIELD  Public Name Contact L. STEPHEN BOWERS  SIC Code (4-digit) a. 3479 b. 2899  Latitude Degrees Minute and Degrees Minute and Degrees Minute and Longitude Degrees Minute and Longitude Degrees Minute and Longitude Degrees Minute and Longitude O39  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (9 characteristic Number (s) (9 characteristic Number (s) (12 characteristic Number (s) (12 digital)  Underground Injection Well Code (UIC) Number (s) (12 digital)  CON 5. PARENT COMPANY INFORMATION  Name of Parent Company  [X] NA  Parent Company's Dun & Bradstreet Number	This report contains information for: (Important: check only one)  Technical Name Contact Name Contact L. STEPHEN BOWERS  SIC Code (4-digit)  Latitude Degrees Minutes  and Longitude 039 44  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)  Underground Injection Well Code (UIC) I.D. Number(s) (Number(s) (12 digits)  ON 5. PARENT COMPANY INFORMATION Hame of Parent Company  XI NA NA Parent Company's Dun & Bradstreet Number	This report contains information for:  Inportant: check only one)  Technical Name Contact  Public Contact  I. STEPHEN BOWERS  SIC Code (4-digit)  Latitude  Degrees  Minutes  Seco  Longitude  Degrees  Minutes  Seco  Longitude  Degrees  Minutes  Seco  Longitude  O39  44  36  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s)  Underground Injection Well Code (UIC) I.D. Number(s)  ON 5. PARENT COMPANY INFORMATION  Game of Parent Company  XI NA  NA  Parent Company's Dun & Bradstreet Number	This report contains information for:  Important: check only one)  Technical Name Contact DONALD C GREENFIELD  Public Contact L. STEPHEN BOWERS  SIC Code (4-digit)  Latitude  Degrees Minutes Seconds  Longitude 039 44 36  Dun & Bradstreet Number(s) (9 digits)  EPA Identification Number(s) (RCRA I.D. No.) (12 characters)  Facility NPDES Permit Number(s) (9 characters)  Underground Injection Well Code (UIC) I.D. Number(s) (12 digits)  Underground Injection Well Code (UIC) I.D. Number(s) (9 S. PARENT COMPANY INFORMATION Number(s) (12 digits)  END 5. PARENT COMPANY INFORMATION Name of Parent Company  XI NA NA  Parent Company's Dun & Bradstreet Number	This report contains, information for: [Important: check only one] a. [X] An entire facility  Technical Contact Contact DONALD C GREENPIELD Telephone Number (includential contact L. STEPHEN BOWERS Telephone Number (includential check only one) b. 2899 c. 3489 d. MA  Latitude and Degrees Minutes Seconds Degrees  Longitude 039 44 36 075  Dun & Bradstreet Number(s) (9 digits) a.  EPA Identification Number(s) (RCRA I.D. No.) (12 characters) b.  Facility NPDES Permit Number(s) (9 characters) a.  Underground Injection Well Code (UTC) I.D. Number(s) (12 digits) b.  CON 5. PARENT COMPANY INFORMATION Game of Parent Company  X] NA NA  Parent Company's Dun & Bradstreet Number	Ton 4. Pacility IDENTIFICATION (Continued)  This report contains information for: [Important: check only one] a. [X] An entire facility b. [] Part of Contact: DONALD C GREENFIELD Telephone Number (include area code (1001)762-8900  Public Name Contact L. STEPHEN BOWERS Telephone Number (include area code (1001)762-8900  SIC Code (4-digit) a. 3479 b. 2899 c. 3489 d. NA e.  Latitude Degrees Minutes Seconds Degrees Minute and Longitude Degrees Minutes Seconds Degrees Minute Degrees Minute And Bradstreet Number(s) (9 digits) a. 002  Dun & Bradstreet Number(s) (9 digits) a. 002  EPA Identification Number(s) (8CRA I.D. No.) (12 characters) b. NA  Facility NPDES Permit Number(s) (9 characters) a. NA  Facility NPDES Permit Number(s) (9 characters) b. NA  Underground Injection Well Code (UIC) I.D. Number(s) b.  Underground Injection Well Code (UIC) I.D. Number(s) D. S. PARENT COMPANY INFORMATION NA  Facility NA NA  Farent Company S Dun & Bradstreet Number

EPA Form 9250-1 (Rev. 12/4/93) - Previous editions are obsolete.

EPA			************************	PAGE 3 OF 9
		EPA FORM R		TRI FACILITY ID NUMBER
Env	ted States ironmental tection	PART II. CHEMICAL-SPECIFIO INFORMATION		19809LLYSR100L0
yde:			5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	Chem., Cat., or Gen. Mane
				1,1,1-TRICHLOROETHANE
SECT	ION 1. TOXIC CHE	MICAL IDENTITY (Important: DO NOT complete thi	is section	
1.1	CAS Munber (Inc	if you complete Section 2 below.)  Cortant: Enter only one number exactly as it as	Progra on the Comies 313 11	
Ī		,	Means on the section 313 1185.	d-1400014P2004P00004P009000490
1.2		Or Charical Carogony None (T		***************************************
l i		or Chemical Category Name (Important: Enter or	nly one name exactly as it appears	s on the Section 313 list.)
		,1-TRICHLOROETHANE		
1.3	Generic Chemica	l Name (Important: Complete only if Part I, S	ection 2.1 is checked "yes."	
	NA.	8		• •
SECTI	ION 2. MINTURE C	CMPONENT IDENTITY (Important: DO NOT complete	this	
+-		Section if you complete Sec	ction 1 above.)	
	NA NA	l Name Provided by Supplier (Important: Max. o	if 70 chars., including numbers, 1	letters, spaces, and punct.
SECUT	OV 2 10mmmm	2 Jun 2000 on an array		
	.UN J. AUL_/ITI	S AND USES OF THE CHEMICAL AT THE FACILITY	(Important: Check all that app	oly.)
M	Manufacture the toxic		If produce or impo	ort:
C	chemicaj:	a. [ ] Produce	c. [X] For on-site us	se/processing
3.1		b. IX Taport	d. [X] For sale/distr	ribution
			e. [ ] As a byproduct	
			f.[] As an impurity	1
2 2	Process the toxic			
3.4	chemicai	a. [] As a reactant	c. [] As an article	COMPONENT
		b. [X] As a formulation component	d. Repackaging	
7	01000000000000000000000000000000000000			
3.3	Otherwise use the toxic	a. [ ] As a chemical processing aid	c. [ ] Ancillary or o	ther use
1	chemical:	b. [X] As a manufacturing aid	or [ ] uncritari or o	rrier aze
Sect	ion 4. MAXIMUM	AMOUNT OF THE TOXIC CHEMICAL ON-SITE AT ANY TI THE CALENDAR YEAR	ΣΕ	
4.1		r two-digit code from instruction package.)		
E.	ra rom 9250-i (	Rev. 12/4/93) - Previous editions are obsolete	Ĺ	

PAGE 3 OF 9

TD)	******************************				PAGE 4 OF 9
EPA	1 1		PA FORM R		TRI FACILITY ID NUMBER
Environmental INFORMA			CHEMICAL-SPECIFIC TION (CONTINUED)		19809LLYSR100LO
Prot   Agen	ection cy		(**************************************		Chem., Cat., or Gen. Name
	99000000000000000000000000000000000000				1,1,1-TRICHLOROETHANE
SECT	ION 5. RELEASES OF THE TOXIC CHEMIC	CAL TO THE	ENVIRONMENT ON-SITE		
	6		A. Total Release (pounds/year)	B. Basis of	C. % From
			(enter range code from instructions or estimate)	Estimate (enter code)	Stormwater
5.1	Fugitive or non-point air emissions	[ ]NA	2400	0	
5.2	Stack or point air emissions	[X]NA	NA NA		
5.3	Discharges to receiving streams or water bodies (enter one name per box)				
5.3.1	Stream or Water Body Name			-464 = 566 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
NA					
5.3.2	Stream or Water Body Name			-00000000000000000000000000000000000000	
5.3.3	Stream or Water Body Name				
5.4	Underground injections on-site	[X]NA	NA		
5.5	Releases to land on-site				
5.5.1	Landfill	[X]NA	НА		
5.5.2	Land treatment/ application farming	[X]NA	NA		
5.5.3	Surface impoundment	[X]NA	NA	4 B H H & 5 B B B B B B B B B B B B B B B B B B	
5.5.4	Other disposal	[X]NA	NA NA		
[]	Check here only if additional Section	on 5.3 info	rmation is provided on page 5 o	f this form.	

							PAGE 5 OF 9
EPA		EPA FORM R	•				TRI FACILITY ID NUMBER
United States Environmental	PART II	. CHEMICAL-SP RMATION (CONTI	ECIFIC				19809LLYSR100L0
Protection Agency	INFOR	CHAILCH (CONII	NOED)				Chem., Cat., or Gen. Name
							1,1,1-TRICHLOROETHANE
Section 5.3 ADDITIONAL INF	ORMATION ON RELEASES OF	THE TOXIC CH	EMICAL TO	THE			
5.3 Discharges to receive streams or water book (enter one name per	lieś	enter	elease (p range cod tions or	ounds/year) e from estimate)	Es	sis of timate er code)	C. % From Stormwater
5.3.4 Stream or Water Boo	y Name					***************************************	
5.3.5 Stream or Water Bod	y Name	-				858689999	
5.3.6 Stream or Water Bod	y Name					***********	
SECTION 6. TRANSFERS OF TH 6.1 DISCHARGES TO 6.1.A Total Quantity Trans	PUBLICLY OWNED TREATME	NT WORKS (POT	V)	DNS			
6.1.A.1 Total Transfers ( (enter range code	pounds/year) or estimate)			Basis of Es (enter code	timate		
NA	77						
6.1.B POTW Name and Locat	ion Information						
6.1.B.1 POTW Name			6.1.B.2	POTW Name		190020400	
Street Address			Street	Address			
City	County		City			Cou	nty
State	Zip Code		State	-		Zip	Code
If additional pages of Par pages in this box [ ] and	t II, Sections 5.3 and, i indicate Which Part II	or 6.1 are at [, Sections 5.	tached, i 3/6.1 pag	ndicate the terminal transfer in the terminal	total numbere. [1]	er of	

EPA	EPA FORM R	•	TRI FACILITY ID NUMBER		
United States Environmental	PART II. CHEMICAL-S	SPECIFIC	19809LLYSR100LO		
Protection Agency	INFORMATION (CONT	(TUOED)	Chem., Cat., or Gen. Name		
			1,1,1-TRICHLOROETHANE		
SECTION 6.2 TRANSFERS TO OTHER O	OFF-SITE LOCATIONS		***************************************		
6.2.1 Off-site EPA Identificatio					
GAD093380814	2004-20000520000000000000000000000000000				
Off-Site Location Name CHEMICA		NC.			
Street Address 1612 JAMES P. R	OGERS CIRCLE				
City VALDOSTA			County LOWNDES		
State GA	Zip Code 31601-	Is location under cont	rol of reporting [ ] YES [X] NO		
A. Total Transfers (pounds/year) (enter range code or estimate	B. Basis of Estimat (enter code)		. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)		
1. 2730	1. 0	1	. M54		
2. NA	2.	2			
3.	3.	3	3.		
4.	4.	4	4.		
SECTION 6.2 TRANSFERS TO OTHER O	FF-SITE LOCATIONS				
6.2.2 Off-site EPA Identification					
Off-Site Location Name					
Street Address		*************************			
City	4 0 11 3 4 0 4 4 4 4 2 0 0 0 0 0 4 4 4 5 4 6 6 6 6 6 9 4 9 6 6 6		County		
71.1					
State	Zip Code	Is location under contr	col of reporting [ ] YES [ ] NO		
A. Total Transfers (pounds/year) (enter range code or estimate)	B. Basis of Estimate (enter code)	B.	B. Type of Waste Treatment/Disposal/ Recycling/Energy Recovery (enter code)		
1.	1.	1.	1.		
2.	2.	2.			
3.	3.	3.			
4.	4.	4.			
If additional pages of Part II, this box [ ] and indicate which	Section 6.2 are attached, inc Part II, Sections 6.2 page t	licate the total number of this is, here. [1] (example: 1,2,3,etc	pages in		

PAGE 7 OF 9

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC 19809LLYSR100L0 Environmental INFORMATION (CONTINUED) Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 7A. ON-SITE WASTE TREATMENT METHODS AND EFFICIENCY [X] Not Applicable (NA) - Check here if no on-site treatment is applied to any waste stream containing the toxic chemical or chemical category. b. Waste Treatment Method(s) Sequence
 [enter 3-character code(s)] a. General c. Range of Influent d. Treatment Based on Waste Stream Concentration Efficiency Operating Data? (enter code ) Estimate 7A.1b 7A.1c 7A.1d 7A.1e 7A.1a 2 Yes No 5 8 NA 6 7A.2b 7A.2c 7A.2d 7A.2e 7A.2a 2 Yes 7A.3b 7A.3c 7A.3d 7A.3e 7A.3a 2 Yes No 5 8 6 7A.4b 7A.4C 7A.4d 7A.4e 7A.4a 1 2 Yes No 5 8 7A.5b 7A.5c 7A.5d 7A.5e 7A.5a 2 Yes 5 8 If additional pages are attached, indicate the total number of pages in this box [ ] and indicate which page this is, here [1].

PAGE 8 OF 9

EPA

EPA FORM R

United States
Environmental
Protection
Agency

Section 7B. ON-SITE ENERGY RECOVERY PROCESSES

PAGE 8 OF 9

TRI FACILITY ID NUMBER

19809LLYSR100L0
Chem., Cat., or Gen. Name

1,1,1-TRICHLOROETHANE

Section 7B. ON-SITE ENERGY RECOVERY P	ROCESSES			
[X] Not Applicable (NA) - Check here stream con	if no on-site energy rectaining the toxic chemica	overy is applied to any waste l or chemical category.		
Energy Recovery Methods [enter 3-char			***************************************	
1 NA	2	3	4	
4				
	***************************************			

] Not Applicable (NA)	- Check here if no on- stream containing th	site recycling is applied ne toxic chemical or chemi	i to any waste	
	er 3-character code(s)]			***************************************
		*		
1 R11	2 NA	3	4	5
6	7	8	9	10
42				

PAGE 9 OF 9

EPA EPA FORM R TRI FACILITY ID NUMBER United States PART II. CHEMICAL-SPECIFIC INFORMATION (CONTINUED) 19809LLYSR100L0 Environmental Protection Chem., Cat., or Gen. Name Agency 1,1,1-TRICHLOROETHANE Section 8. SOURCE REDUCTION AND RECYCLING ACTIVITIES All estimates can be reported Column A Column B Column C Column D using up to two significant 1992 1993 1994 1995 figures. (pounds/year) (pounds/year) (pounds/year) (pounds/year) 8.1 Quantity released \* 1200 1200 300 0 Quantity used for energy recovery on-site 0 0 0 0-Quantity used for energy recovery off-site 0 0 0 0 8.4 Quantity recycled on-site 4580 1800 0 0 Quantity recycled off-site 0 0 0 Quantity treated on-site 0 0 0 8.7 Quantity treated off-site 0 2730 3000 0 Quantity released to the environment as a result of remedial actions, catastrophic events, or one-time events not associated with production processes (pounds/year) 8.9 | Production Ratio or Activity Index 0001.01 Did your facility engage in any source reduction activities for this chemical during the reporting year? If not, enter "NA" In Section 8.10.1 and answer Section 8.11. 8.10 Source Reduction Activities Methods to Identify Activity (enter codes) [enter code(s)] 8.10.1 NA a. b. C. 8.10.2 a. b. C. 8.10.3 a. b. C. 8.10.4 a. C. Is additional optional information on source reduction, recycling, or pollution control activities included with this report? (Check one box) 8.11 NO [X] Report releases pursuant to EPRCA Section 329(8) including "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." Do not include any quantity treated on-site or off-site.

EPA Form 9250-1 (Rev. 12/4/93) - Previous editions are obsolete.

# FIFRA/TSCA TRACKING SYSTEM INPUT DOCUMENT: INSPECTIONS TSCA, OTHER THAN ASBESTOS

(FIELDS IN BOLD ARE REQUIRED !)

FORM COMPLETED BY: M. Reynolds	
INSPECTION DATE: 2/9/95 INSPECTOR NUM: FRIII-10/sequence: 0/	
FILE# 95-3/30-0/7	
LEGISLATION IND: INSPECTION TYPE: <u>EEA</u> INSPECTION STATUS: C (see reverse)	
REGION/STATE: 03 INSPECTOR NAME: Reynolds (1ast name)	
REASON FOR INSPECT: NSR REFERRAL TYPE: RR NUMBER SAMPLES: (See reverse)	2
REPORT RECEIVED://_	
CBI:   (Y/N) WARRANT REQUIRED: N (Y/N)	
FACILITY FUNCTION: $MN$ FED FACILITY: $N$ (Y/N) (see reverse)	
REMARKS:	
SITE NAME: Alloy Surface Co. Inc. SITE ADDR: 100 Lock Rd.	
SITE CITY: Wilmington SITE STATE: DE	
SITE ZIP: 19809 SITE SIC CODES: 3479	
(see reverse)	
PARENT CO NAME:	
PARENT CO ADDR:	
PARENT CO STATE: PARENT CO ZIP:	_
***GENERIC FIELDS***	-
IDENTIFIER: DATE REPORT COMPLETED:/ FIELD CITATION: (Y/N)	
LATITUDE: (degrees, minutes, seconds)  LATITUDE: (degrees, minutes, seconds)	
For INSPECTION TYPE, REASON FOR INSPECTION, REFERRAL TYPE, FACIL	ITY
PINCETON STO CARES OF THE PARTY	

CULLE	DESCRIPTION	More	DESCRIPTION	CODE	DESCRIPT
131	SECTION 13 IMPORTER INSPECTION	CODE		27	
1 3R	SECTION 13 RELORDS REVIEW	BK	BROKER	27 98	SECTION 25/27 REFERROL
2XP	SECTION 12 EXPORT	CV	CONNEYOR	Acres -	HEAUGUMITERS TO HEBION REBION TO HEAUGURITERS !
4C1	FUR SECTION 4 INSPECTIONS	DA	PERMITTED DISPUSER - ALTERNATIVE METHODS	rie RR	
4EE	SECTION 4 ECOLOGICAL EFFECTS DATA ALBIT	DH	PERMITTED DISPOSER - HIGH EFFIC BUILERS	HS HS	REGION TO NEGION REFERM
4HE	SECTION 4 HEALTH EFFECTS DATA AUDIT	10	PERMITTED DISPOSER - INCINERATOR	NS SR	REGION TO STATE REFERRAL
460	SECTION 4 BOOD LABORATORY PRACTICES	DL	PERMITTED DISPOSER - LANDFILL	<b>49</b> 1	STATE TO NEGIUM REFERRAL
SLE	SECTION 5 CHEMICAL SUBSTRACE EXEMPTION	DM	PERMITTED DISPOSER - DREDGE/SLUDGE MATER		
5CI	FOR SECTION 5 INSPECTIONS	DP	DISPOSER		
Œ	SECTION 5 (E) OF (F) ORDER	DR	PERMITTED DISPOSER - NESEARCH/DEVELUP		
5FN	SECTION 5 FAILURE TO MOTIFY	DF 	DISTRIBUTOR		
5PM	SECTION 5 PREDIMINATURE NUTTOE	LB	LABORATORY		
550	SECTION 5 SIGNIFICANT NEW USE HULE	M(	MANUFACTURER/ IMPORTER		
SM	SECTION 5 TEST PHINETING EXEMPTION	104	NOOLFACTURER ORDERSSERR		
6AA	SECTION 6 ASSESTUG AARP CONDUCTED	PC	PROCESSOR		
GAF	SECTION 6 ASSESTUS FEDERAL CUMOUCTED	PS	SECUNDARY PROCESSOR		
6AS	SECTION 6 ASSESTOS STATE CONDUCTED	PT	PORT OF ENTRY		
6UF	SECTION 6 CHLONOFLOURUCHREUNS	SF	STURER		
6CI	FOR SECTION 6 INSPECTIONS	US	USER		
6CR	SECTION 6 HEXAVALENT//CHRUNIUM				
6CS	STATE HEXAMPLENT CHRONILOI		THE PERSON AND ADDRESS OF THE PERSON AND PARTY.		
6DX	SECTION 6 DIUXIN		THEA REAGON FOR INSPECTION CODES		
ena ena	SECTION 6 PUB AAAP CONDUCTED		neuro at 10M		
SPF	SECTION 6 PCB FEDERAL COMOUCTED	CODE	DESCRIPTION	-	
6PS	SECTION 6 PCB STATE CONDUCTED		TOO COURSE ASSESSMENTER	121 8	5
6MA	SEC. 6 ASSESTUS MORKEN PHOTECTIUM ANAP	FCA	FOR CRUSE, ASSOCIATED		
6MF	SEC. 6 ASSESTUS HORNER PROTECTION FEDERAL	FCO	FUR CHUSE, DESPOSAL		
6MS	SEC. 6 ASSESTOS HORKEN PHOTEUTION STATE	FOF	FON CAUSE, FOLLOW-UP		
		FC8	FUR CHUSE, GUVENOLENT		
/CI	FUR SECTION 7 INSPECTIONS	FOH	FOR CRUSE, HEADQUARTERS FOR CRUSE, PHIVATE CITIZEN/PRESS COMPLAI		
71H	SECTION 7 INSTRUCTIONS SECTION 7 INVINENT HAZARD	FUP	FOR CAUSE, PHIVATE CITIZEN/FRESS COMPLAINT	1	
HAS	SECTION SA ASSESTUS RULE	FCM			
BCI 138	SECTION A CONFIDENTIAL INSPECTIONS	FCV	FUR CHUSE, VIULATION		
RCH	SECTION & CONFIDENTIAL INSPECTIONS SECTION &C RECORDS NALE	NSA	MEUTRAL SCHENE, ASSOCIATED		
BHS	SECTION BO HEALTH AND SAFETY STUDIES	Mass	MEUTINGL SCHOOL FULLOW-UP		
BLA	SECTION BY HEALTH AND SWELL STORIES	NEW	NEUTRAL SCHENE, HEADQUARTERS NEUTRAL SCHENE INDIAN TRIBE		
8MV	SECTION OF CEVEL W MALE	ISN			
BSM	SECTION BE SUBSTANTIAL RISK	MER	NEUTRAL SCHENE, REGION .		
ACU	ASBESTUS ASHAA CLUSE UUT	MES	NEUTHAL SCHOOL, STATE		
HEA	HENR, ENFUNCEMENT, ARMY COMBUCTED	OVR	SAC OVERVIEW INSPECTION		
ALF	HERA, EN-CIRCEPENT, FEDERAL CONDUCTED	SCD	SECURGARY INSPECTION	18	
HES	HENR, ENFORCEMENT, STATE CUMULTED		Code Code Description	7 64	
AUN	ASSESTOS ASHAA ON SOLING	-56	Nonprofit Membership Orga	BRIZAR	ion
APA	ASBESTUS ASHAA PRE AMARO	651		ng	
	ASSESTUS ASSESTUS PARE PRODUCTION	8999	9 Other		
PLIN	EPCHA, ENFORCEMENT, AARP COMOUCTED	40	Railroad Refrigerated Warehousing	·	
EEF	EPCHA, ENFORCEMENT, FEDERAL CUROLICES	422 739		Lab	
الک	crum, crumcheni, reserve wasself	599	9 Scrapyard	100	
		495	2 Savage Treatment	8	
SIC C	code Code Description	892	(1977년 - 1987년 br>- 1987년 - 1987	T <sup>or</sup>	
07	Agricultural Services	422			
90	Alternate Disposal/Disposal	492	g deiliev. Gas		
93	Broker	92	Waste Oil Dealer		
15	Construction	24	Lumber and Wood Products	¥	
1799	Contractor/Disposal/Waste Oil Educational Services	28	Manufacturing, Chemical		i agaza
7629	Electrical Equipment Repair	36	Manufacturing, Electrica Manufacturing, Food/Feed		Ibmeur
91	Electrical Equipment Retrofill	20 34			
91	Hazardous Waste Handler	30	Manufacturing, Miscellan	LEOUS	
94	Health Services Intermediate	310.	Manufacturing, Rubber/Ti	re	Emileo
		37	Manufacturing, Transport	SELOR	Edg 1 bus



100 Locke Road • Wilmington, DE 19809-3513 (302) 762-8900 • FAX: (302) 762-7213

### **FACSIMILE COVER SHEET**

Date: Feb 16,1995
Please promptly deliver the following transmittal to:
Firm: EPA PEGLOW TIL (3ATIZ)
Attention: MALCOLM REYWOLDS
Fax #: 215-597-3156
MALCOLM
THE FELLOWING IS THE NUMBER OF
TEMPLOYEE'S AT MUCH SORFACES FOR THE
TAPES 400 REQUESTED
DATE 1991 1992 1993 1994
Zup 45 50 70 65
Donald Greeful &
Compliance Manager
We are transmitting \ pages, which include this cover letter.
vve are dansinicing pages, winds



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107-4431

FEB 0 2 1995

Mr. Donald Greenfield Alloy Surfaces Co., Inc. 100 Locke Road Wilmington, DE 19809-3513

RE: Superfund Amendments and Reauthorization Act (SARA) Title III Section (§) 313 Data Quality Audit Inspection

Dear Mr. Greenfield:

This is to confirm that Malcolm Reynolds of my staff will visit your facility on Thursday, February 9, 1995 at 10:30 a.m. to conduct a SARA Title III Section 313 Data Quality Inspection Audit (DQIA). He is a member of the National Council of Senior Citizens designated by the EPA Administrator to conduct inspections under SARA Title III.

The purpose of the DQIA is to verify the accuracy of your facility's Form R submission(s) to EPA. A review of the appropriate quantity of chemicals reported will also be verified.

To save time during the inspection, please have available for review the following documents:

a copy of the Threshold Determination Calculations for each of the §313 chemicals used by your facility during the 1991, 1992, and 1993 calendar years along with the supporting documentation. The supporting documentation may include such items as beginning and end-of-year inventory, purchase and, if applicable, import records. In addition, if your facility manufactures any listed §313 chemical, please include the appropriate chemical production records.

a copy of all 1991, 1992, and 1993 Form R's and a copy of the supporting documentation used for completing the Form R(s). The documentation should substantiate the Form R data elements submitted by your facility for such items as: Activities And Uses Of The Chemical At The Facility (Section 3); the Maximum Amount of Chemical On-Site At Any Time During The Calendar Year (Section 4); Releases Of The Chemical To The Environment On-Site (Section 5); Transfers of the Chemical In Wastes To Off-Site Locations (Section 6); On-Site Waste Treatment Methods and Efficiency (Section 7A); On-Site Energy Recovery Processes (Section 7B); On-Site Recycling Processes (Section 7C) and; Source

Data Qual

Reduction and Recycling Activities from Section 8 (only for calendar years 1991 and beyond).

In addition to the above items, please notify Malcolm Reynolds of any safety equipment (e.g. eye or ear protection, safety shoes, hard hat, etc.) he should bring with him to the inspection.

Enclosed is a list of the chemicals subject to SARA Title III §313. If time permits, he will tour your plant. If you have any questions, please call Malcolm Reynolds at (215) 597-3659.

sincerely,

Craig Yussen

TRI Outreach Coordinator (3AT12)
TSCA Enforcement & TRI Section

Enclosure

cc: Section 313 State Contact

Stephanie Branch-Wilson (3HW34)

NO.

US ENVIRONMENTAL PROTECTION AGENC

Emergency Planning, and Community Right-to-Know

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION IDAILY SEC. NO. THE CETOR NO.

ER111-001

U.S. EPA Region 3, (3AT/2) 841 Chestnut Building Philadelphia, PA 19107

Alloy Surfaces Co. Inc.

Page

Of

100 Locke Rd. Wilmington DE 19809

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Energency Planning and Community Right-to-Know Act of 1986 receipt of the documenties and/or sample is described is hereby acknowledged:

Use of 11,1 Trichloroethane in 90,91,9393 Form R's for 11, 1 Trichloroethane for 1992 and 1993

Chemical identities for underlined items have been claimed as trade secret. The facility official requesting such treatment has read and understands EPCRA Section 322 and pertinent trade secret regulations and understands EPCRA Section 325 which provides for (among other things) penalties for frivolous claims.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE
Malohn Reynolds		Donald Greenful A
NAME		NAME
MALCOLM REYNOLDS	*	DOWNED GREEN FIFELIS
MAS	DAYE SIGHED	TITLE DATE SIGNED
TECHNICAL ASSISTANT	2/9/95	St Technica Notion 2/9/95

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION III
841 CHESTNUT BUILDING
MAIL CODE
PHILADELPHIA, PA. 19107- 4431
OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300

9/26/95 Tues 10AM Pete Barattini Joseph Spadea Crescent I ton Works 4901 Grays Ave 729-1204 PO Box 19150 Philas, PA 19143

E-55

027)

58354

Rt 95 from N

Exit at Air port Exit

Stay right form tt. (about 3/4 miles on Bartram)

Goto Bartram, turn tt. (about 3/4 miles on Bartram)

torn left at Lindbergh B Iver. which

turn tt. at Lindbergh B Iver. which

joins Grays Ave (in about 3/2 miles)

**Donald C. Greenfield**Director of Manufacturing



100 Locke Rd, Wilmington, DE 19809-3513 (302) 762-8900 EXT: 1248 • FAX: (302) 762-7213

### UNITED STATE ENVIRONMENTAL PROTECTION AGENCY

REGION III 841 CHESTNUT BUILDING MAIL CODE. PHILADELPHIA, PA. 19107-4431 OFFICIAL BUSINESS PENALTY FOR PRIVATE USE \$300

Feb 9,95

Don Green field - Consultant now (exemployee)

302762-8900

Bet seen & Walnut Hu

Alloy Surfaces Co. Inc. 100 Locke Rd.

Wilmington DE 198093513

495 Edmoor Exit

(Philadelpio) (March Rd)

(Philadelpio) (March Rd)

(Philadelpio) (March Rd)

(Belle fon te)

Section

on Hay Rond on 495, Between Power Plant of Du Pont

3479

Taxi H+G 785-4700 H+B Morrisville 295-4000

(79) Phila 9:02 Carolinian Wilm 9:23

Wilm 1:29
Phila 2:00
Phila 2:24
Phila 2:24

: ALLOY SURFACES CO. INC.

: 100 LOCKE RD.

01/06/95 09:43:43

Region TRI Facility ID EPA ID Name 03 19809-LLYSR-100Lo DED980827919 Address City/State/Zip: WILMINGTON, DE 198093513 Document Control Number: 13 93 07013396-8-DE Reporting Year 1993 Rptg for Entire Facility : A (AN ENTIRE COVERED FACILITY) Maximum Amount Code : 03 (1,000--9,999) Chemical ID : 000071-55-6 Chemical Name : 1,1,1-TRICHLOROETHANE : NA Mixture Component ID Certification Name : L. STEPHEN BOWERS Certification Title : PRESIDENT Certification Date Signed: 06/28/94 Cert. Signature Indicator: P (PHOTO COPY) Facility County : NEW CASTLE Assigned DUNS Number : 002341824 Assigned EPA ID : DED980827919 State/County FIPS Code : 10003 Assign Centroid Latitude: 394612 Assign Centroid Longitude: "753006 Latitude : 394436 Longitude : =753012 UIC ID : NA Magnetic Media ID : 03808 Parent Company Name : NA Parent DUNS Number : NA Technical Contact Name : DONALD C GREENFIELD Technical Contact Phone : (302) 762-8900 Public Contact Name : L. STEPHEN BOWERS Public Contact Phone : (302) 762-8900 Postmark Date : 06/28/94 Receipt Date : 06/30/94 EPA ID Number (s) : DED980827919 NA DUNS Number (s) : 002341824 NA : 3479 2899 3489 NA SIC Code(s) NPDES Permit Number(s) \*\* TYPES OF ACTIVITY/USES \*\* ONSITE USE SALE/DISTR Manufacture : IMPORT REPACKAGE Process : FORM COMP

Otherwise Used: MANUF AID

Estimate N/A Basis of Estimate

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100LO

: ALLOY SURFACES CO. INC. Region TRI Facility ID EPA ID Name 03 19809 LLYSR 100LO DED980827919 Address : 100 LOCKE RD. City/State/ZIP: WILMINGTON, DE 198093513 Document Control Number: 13-93-07013396-8-DE \*\* FUGITIVE OR NON-POINT AIR EMISSIONS \*\* Reporting Range . 2,400 Estimate Estimate N/A Basis of Estimate : O (BASED ON OTHER APPROACHES) \*\* STACK OR POINT AIR EMISSIONS \*\* Reporting Range : Estimate Estimate N/A : Y Basis of Estimate \*\* DISCHARGE TO WATER \*\* Stream Code : A Stream Name : NA Reporting Range : Estimate Estimate N/A Basis of Estimate : % From Stormwater : 0.00 % From Stormwater N/A: \*\* UNDERGROUND INJECTION \*\* Reporting Range : Estimate Estimate N/A Basis of Estimate \*\* RELEASE TO LAND \*\* Land Disposal Code : DO2 (ON-SITE LANDFILL) Reporting Range Estimate Estimate N/A Basis of Estimate : \*\* RELEASE TO LAND \*\* Land Disposal Code : DO3 (LAND TREATMENT/APPLICATION FARMING) Reporting Range Estimate

TRRO3BS PAGE: 3

Treatment/Disposal : M54

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM FACILITY PROFILE REPORT FOR FACILITY ID:19809LLYSR100L0

Region TRI Facility ID EPA ID Name : ALLOY SURFACES CO. INC. Address : 100 LOCKE RD. 03 19809 LLYSR 100LO DED980827919 City/State/ZIP: WILMINGTON, DE 198093513 Document Control Number: 13-93-07013396-8-DE \*\* RELEASE TO LAND \*\* Land Disposal Code : DO5 (SURFACE IMPOUNDMENT) Reporting Range : Estimate Estimate N/A Basis of Estimate : \*\* RELEASE TO LAND \*\* Land Disposal Code : D99 (OTHER DISPOSAL) Reporting Range : Estimate Estimate N/A : Y Basis of Estimate \*\* OTHER OFF-SITE LOCATION \*\* Off Site ID : 31601CHMCL1612J Off Site Location Code: 01 EPA ID (RCRA ID NO.) : GAD093380814 Off-Site Name : CHEMICAL CONSERVATION OF GEORG IA INC. Street Address : 1612 JAMES P. ROGERS CIRCLE City : VALDOSTA County : LOWNDES State : GA Zip Code : 31601 Country Code Control of Rpt. Facil.: N (NO, LOCATION IS NOT UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY) Reporting Range : Estimate . 2,730 Estimate N/A : Basis of Estimate : 0 (BASED ON OTHER APPROACHES)

(INCINERATION/INSIGNIFICANT FUEL VALUE)

TRROJBS UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM

PAGE: FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100LO Region TRI Facility ID EPA ID : ALLOY SURFACES CO. INC. Name Address : 100 LOCKE RD. 19809 LLYSR 100LO DED980827919 03 City/State/ZIP: WILMINGTON, DE 198093513 Document Control Number: 13-93-07013396-8-DE \*\* OTHER OFF SITE LOCATION \*\* Off Site ID : 31601CHMCL1612J Off-Site Location Code: 01 EPA ID (RCRA ID NO.) : GAD093380814 Off-Site Name : CHEMICAL CONSERVATION OF GEORG IA INC. Street Address : 1612 JAMES P. ROGERS CIRCLE City : VALDOSTA County : LOWNDES County State : GA : 31601 Zip Code Country Code Control of Rpt. Facil.: N (NO, LOCATION IS NOT UNDER CONTROL OF REPORTING FACILITY OR PARENT COMPANY) Reporting Range : Estimate Estimate N/A Basis of Estimate Treatment/Disposal : \*\* TOTAL QUANTITY TRANSFERRED TO POTW \*\* Reporting Range 9 Estimate Estimate N/A : Y Basis of Estimate \*\* WASTE TREATMENT METHODS AND EFFICIENCY \*\*

General Wastestream Code Treatment Method Code Range of Influent Concentration : Sequential Treatment Treatment Efficiency Estimate : Based On Operating Data :

\*\* ONSITE ENERGY RECOVERY PROCESSES \*\*

Energy Onsite Process Code : NA

\*\* ONSITE RECYCLING PROCESSES \*\*

Recycle Onsite Process Code : R11 (SOLVENTS/ORGANICS RECOVERY BATCH STILL DISTILLATION)

Recycle Onsite Process Code : NA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
TOXIC RELEASE INVENTORY SYSTEM
FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100L0

TRR03BP PAGE: 5

Region TRI Facility ID EPA ID Name : ALLOY SURFACES CO. INC.
03 19809 LLYSR\*100L0 DED980827919 Address : 100 LOCKE RD. City/State/Zip: WILMINGTON, DE 198093513 Document Control Number: 13-93-07013396-8-DE \*\* SOURCE REDUCTION AND RECYCLING ACTIVITY \*\* 1993 1994 1995 1992 (POUNDS/YEAR) (POUNDS/YEAR) (POUNDS/YEAR) (POUNDS/YEAR) Quantity Released : 1,200
Quantity Used For Energy Recovery On Site : 0 1,200 300 0 Quantity Used For Energy Recovery Off-Site : Quantity Recycled On Site : 4,580
Quantity Recycled Off Site 0 Quantity Recycled Off Site
Quantity Treated On Site
Quantity Treated Off Site

Off Site

Off Site 1,800 0 0 2,730 3,000 5,730 Totals : 5,780 3,300

Quantity Released Due To Remedial Action : 1.01

\*\* SOURCE REDUCTION ACTIVITY CODE(S) \*\*

Source Reduction Activity: NA

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Region TRI Facility ID EPA ID : ALLOY SURFACES CO. INC. Name 03 19809-LLYSR-100L0 DED980827919 : 100 LOCKE RD. Address City/State/Zip: WILMINGTON, DE 198093513 Document Control Number: 13-92-06018408-8-DE Reporting Year Rptg for Entire Facility : A (AN ENTIRE COVERED FACILITY) Maximum Amount Code : 03 (1,000-9,999) Chemical ID : 000071-55-6 Chemical Name : 1,1,1 TRICHLOROETHANE Mixture Component ID : NA Certification Name : L. STEPHEN BOWERS Certification Title : PRESIDENT Certification Date Signed: 10/08/93 Cert. Signature Indicator: P (PHOTO COPY) Facility County : NEW CASTLE Assigned DUNS Number : 002341824 Assigned EPA ID : DED980827919 State/County FIPS Code : 10003 Assign Centroid Latitude: 394612 Assign Centroid Longitude: =753006 Latitude : 394436 Longitude : #753012 UIC ID : NA Magnetic Media ID : D4227 Parent Company Name : MATEC CORP. Parent DUNS Number : 002341824 Technical Contact Name : DONALD C GREENFIELD Technical Contact Phone : (302) 762-8900 Public Contact Name : L. STEPHEN BOWERS Public Contact Phone : (302) 762-8900 Postmark Date : 07/01/93 Receipt Date : 07/06/93 EPA ID Number (s) : DED980827919 NA : 002341824 NA DUNS Number (s) SIC Code(s) : 3479 2899 3489 NA NPDES Permit Number (s)

Alloy Surfaces

\*\* TYPES OF ACTIVITY/USES \*\*

Manufacture : IMPORT ONSITE USE

Process : FORM COMP REPACKAGE

Otherwise Used: MANUF AID

Estimate N/A

Basis of Estimate :

: Y

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100L0

Region TRI Facility ID EPA ID : ALLOY SURFACES CO. INC. Name Address : 100 LOCKE RD. 19809 LLYSR 100LO DED980827919 City/State/ZIP: WILMINGTON, DE 198093513 Document Control Number: 13-92-06018408-8-DE \*\* FUGITIVE OR NON-POINT AIR EMISSIONS \*\* Reporting Range Estimate 1,200 Estimate N/A Basis of Estimate : O (BASED ON OTHER APPROACHES) \*\* STACK OR POINT AIR EMISSIONS \*\* Reporting Range : Estimate Estimate N/A : Y Basis of Estimate : \*\* DISCHARGE TO WATER \*\* Stream Code : A Stream Name : NI Reporting Range : Estimate Estimate N/A : Basis of Estimate : % From Stormwater : 0.00 % From Stormwater N/A: \*\* UNDERGROUND INJECTION \*\* Reporting Range : Estimate Estimate N/A Basis of Estimate : \*\* RELEASE TO LAND \*\* Land Disposal Code : DO2 (ON-SITE LANDFILL) Reporting Range : Estimate Estimate N/A Basis of Estimate : \*\* RELEASE TO LAND \*\* Land Disposal Code : DO3 (LAND TREATMENT/APPLICATION FARMING) Reporting Range : Estimate

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100LO

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Region TRI Facility ID 03 19809-LLYSR-100LO DED980827919

Name : ALLOY SURFACES CO. INC. Address : 100 LOCKE RD.

City/State/ZIP: WILMINGTON, DE 198093513

Document Control Number: 13-92-06018408-8-DE

\*\* RELEASE TO LAND \*\*

Land Disposal Code : DO5 (SURFACE IMPOUNDMENT)

Reporting Range Estimate Estimate N/A : Y

Basis of Estimate

\*\* RELEASE TO LAND \*\*

Land Disposal Code : D99 (OTHER DISPOSAL)

Reporting Range Estimate Estimate N/A : Y Basis of Estimate

\*\* TOTAL QUANTITY TRANSFERRED TO POTW \*\*

Reporting Range Estimate Estimate N/A : Y Basis of Estimate :

\*\* WASTE TREATMENT METHODS AND EFFICIENCY \*\*

General Wastestream Code : NA Treatment Method Code Range of Influent Concentration : Sequential Treatment

Treatment Efficiency Estimate : 0.00

Based On Operating Data

\*\* ONSITE ENERGY RECOVERY PROCESSES \*\*

Energy Onsite Process Code : NA

\*\* ONSITE RECYCLING PROCESSES \*\*

Recycle Onsite Process Code : NA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TOXIC RELEASE INVENTORY SYSTEM FACILITY PROFILE REPORT FOR FACILITY ID: 19809LLYSR100LO

TRROSBP PAGE:

Region TRI Facility ID 03 19809 LLYSR 100LO

EPA ID DED980827919

: ALLOY SURFACES CO. INC.

Name : ALLOY SURFACES
Address : 100 LOCKE RD.

City/State/Zip: WILMINGTON, DE 198093513

Document Control Number: 13-92-06018408-8-DE

\*\* SOURCE REDUCTION AND RECYCLING ACTIVITY \*\*

		1991 (POUNDS/YEAR)	992 OS/YEAR)	1993 (POUNDS/YEAR)	1994 (POUNDS/YEAR)
Quantity Released	*	1,200	1,200	1,200	600
Quantity Used For Energy Recovery On Site	0	0	0	0	0
Quantity Used For Energy Recovery Off Site	:	0	0	0	0
Quantity Recycled On Site	:	1,820	4,580	4,500	1,800
Quantity Recycled Off-Site		0	0	0	0
Quantity Treated On Site	*	0	0	0	0
Quantity Treated Off Site	:	0	0	0	0
Totals	:	3,020	 5,780	5,700	2,400

Quantity Released Due To Remedial Action : 1.31 Production Ratio/Activity Index

\*\* SOURCE REDUCTION ACTIVITY CODE(S) \*\*

Source Reduction Activity: NA

PERMICLIP
PERMICLIP
PERMICLIP
PERMICLIP
PERMICLIP
PERMICLIP
DE DEACLIP

PERIMONIO
PERIMO

Alloy Surface & G. Inc 8-3130-1 100 Locke Rd. 100 Locke Rd. Wilming ton DE 19809-3513 Con Green Field 302-762-8900 Feb 9 1995 SIC3479

M. Reynolds